

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 Six Target Locations and One Target Vehicle, as
 further described in Attachments A1-A7

Case No. MJ23-356

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachments A1-A7, attached hereto and incorporated herein by reference.

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1), and 846; and 18 U.S.C. §§ 1956(a) and (h)	Distribution and/or Possession of Controlled Substances with Intent to Distribute; Conspiracy to Distribute Controlled Substances; Laundering of, Conspiracy to Launder, Monetary Instruments.

The application is based on these facts:

☒ See Affidavit of DEA TFO Christopher L. VandenBos, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



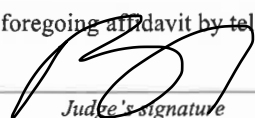
Applicant's signature

Christopher L. VandenBos, TFO, DEA

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 07/14/2023



Judge's signature

City and state: Seattle, Washington

Hon. Brian A. Tsuchida, United States Magistrate Judge

Printed name and title

AFFIDAVIT OF CHRISTOPHER L. VANDENBOS

STATE OF WASHINGTON)

_____)

COUNTY OF WHATCOM)

I, Christopher L. VandenBos, being first duly sworn on oath, depose and say:

INTRODUCTION AND AGENT BACKGROUND

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7) and a “general authority Washington peace officer” within the definition of RCW 10.93.020. Specifically, I am a commissioned Sheriff’s Deputy with the Whatcom County Sheriff’s Office. I have been employed by the Whatcom County Sheriff’s Office since June 2015. In that capacity, I investigate violations of the Revised Code of Washington (RCW). In January 2019, I assumed the role of a Narcotics Detective with the Whatcom Gang and Drug Task Force, with the focus of my responsibilities including the investigation of mid to upper-level drug traffickers.

2. I am also a Task Force Officer with the Drug Enforcement Administration (“DEA”), assigned to the Bellingham, Washington Resident Office. In that capacity, I investigate violations of the Controlled Substances Act (Title 21, United States Code, Section 801, *et seq.*). I have been assigned as a Task Force Officer with the DEA since January 2019. During my time conducting investigations with the DEA, I have written and sworn to multiple federal and state search warrants and orders related to the installation of pen registers, trap and trace, and real-time location information for mobile devices. I have written multiple state and federal search warrants for data stored by social media platforms, and am familiar with the technologies used by Facebook, Instagram, Snapchat, Google, and other companies, and how it relates to tracking an individual’s movement, either live or historical.

1 3. I have completed the Undercover Techniques and Survival for Narcotics
2 Officers School hosted by the Western Regional Counterdrug Training Center, a forty-hour
3 Criminal Investigations Using Cellular Technologies course hosted in Las Vegas, Nevada,
4 a twenty four hour Fugitive Mission Planning and Cellular Investigative Techniques course
5 hosted in Bellingham, WA, a forty-hour DEA Task Force Officer School hosted in
6 Quantico, Virginia, and other training courses related to criminal street gangs, narcotics
7 trafficking, electronic surveillance, money laundering, and fentanyl-related overdose
8 deaths. I have completed hundreds of hours of law enforcement related training, to include
9 investigatory techniques, surveillance, evidence collection, cell phone technology, and
10 other topics.

11 4. As a Whatcom County Sheriff's Office Deputy, I have participated in
12 multiple death investigations, including homicide, overdose, and natural death
13 investigations. I have participated in fugitive operations spanning multiple states, and have
14 used my training and experience as it relates to electronic evidence to capture wanted
15 subjects who were fleeing from law enforcement.

16 5. Based on my training and experience, I have become familiar with the
17 techniques and methods used by drug traffickers to distribute controlled substances, their
18 use of vehicles, their use of cellular phones and other electronic communication devices to
19 facilitate their trafficking activity, and the methods used to conceal and launder the
20 proceeds of drug trafficking. I have participated in hundreds of hours of surveillance on
21 narcotics traffickers. I have examined narcotics related pay/owe ledgers, supplier lists, and
22 cell phone content, and understand how they are used in relation to drug sales and
23 trafficking. During the course of my employment, I have served search warrants and
24 conducted narcotics-related interviews in Washington and other states, and have discussed
25 drug trafficking and money laundering trends with members of federal and state law
26 enforcement from across the United States, as well as those working in other countries.
27

1 6. I have experience acting in an undercover capacity. I have purchased
2 controlled substances such as fentanyl-laced pills, fentanyl-laced powder, cocaine, heroin,
3 and methamphetamine while acting in an undercover capacity. While acting in an
4 undercover role, I have arranged narcotics transactions, discussed counter-surveillance
5 methods to avoid law enforcement, and discussed prices, quantity, and quality of various
6 controlled substances.

7 7. I have attended a course instructed by the Royal Canadian Mounted Police
8 (RCMP) Clandestine Laboratory Enforcement and Response team, which discussed topics
9 on synthetic drug manufacturing, including information regarding fentanyl in powder and
10 pill form. During that training, I participated in a pill encapsulating demonstration using a
11 pill press and other equipment.

12 8. In 2014, I obtained a Bachelor of Arts (BA) from Western Washington
13 University in Sociology, with an emphasis in Criminology. During that time, I completed
14 research courses involving Mexico-based drug trafficking networks, statistics, and data
15 analytics. I also obtained a minor degree in Spanish Language.

16 9. I speak Spanish at the conversational level. I have used Spanish to interview
17 confidential informants, witnesses, and suspects during the course of state and federal
18 narcotics investigations. In my role as a Task Force Officer with the Drug Enforcement
19 Administration, I have participated in Title III wiretap investigations, and have monitored
20 live phone intercepts between Spanish-speaking drug traffickers. While monitoring these
21 phone intercepts, I have spoken with certified Spanish translators, who have further
22 explained common slang terms, expressions, and code words used by drug traffickers for
23 narcotics-related language and terms.

24 10. I have training and experience as it relates to the blue "M 30" stamped
25 fentanyl-laced pills mentioned in this Affidavit. I have been involved in the seizure of
26 thousands of similar fentanyl-laced pills, and have submitted such pills for testing to
27 various laboratories. I have reviewed laboratory analysis reports from both the Drug

1 Enforcement Administration (DEA) and Washington State Patrol (WSP) laboratories,
2 which have indicated the presence of fentanyl in similar pills. I know, based on training
3 and experience, that similar suspected fentanyl-laced pills are commonly manufactured by
4 clandestine laboratories in Mexico, and subsequently smuggled in the United States for
5 redistribution and consumption. I have spoken with multiple confidential sources who have
6 admitted to the prior use of similar fentanyl-laced pills, and have testified to their narcotic
7 effect.

8 **PURPOSE OF THIS AFFIDAVIT**

9 11. I make this affidavit in support of an application under Rule 41 of the Federal
10 Rules of Criminal Procedure for a warrant to search the following premises, described in
11 Attachments A1-A7 to this Affidavit, for the property and items described in Attachment
12 B to this Affidavit, as well as any digital devices or other electronic storage media located
13 therein:

14 a. **Target Location 1 (TL1): 6069 Neevel Road, Ferndale, WA 98248:**
15 Target Location 1, as further described in Attachment A1, is located at 6069 Neevel Road,
16 Ferndale, WA. Target Location 1 is a white travel trailer with thin dark stripes running
17 laterally along the sides. There are two doors facing east. There is a green staircase leading
18 to one of the doors.

19 b. **Target Location 2 (TL2): 1401 Woodstock Way, Unit #102H,**
20 **Bellingham, WA 98226:** Target Location 2, as further described in Attachment A2, is an
21 apartment labeled #102H, located at 1401 Woodstock Way, Bellingham, WA. Target
22 Location 2 is located within a multi-unit residential complex that is tan in color with white
23 trim. The door for unit 102-H is located on the south side of the residential complex, facing
24 south. Unit 102-H is located on the first floor and the numbers reading "102-H" are affixed
25 to the door. The door is white in color. There is an affixed Patio with a white railing on the
26 north side of the complex for unit 102-H.

c. **Target Location 3 (TL3): 966 E. 69th Vista, Apt. 7, Lynden, WA**

98264: Target Location 3, as further described in Attachment A3, is located at 966 E. 69th Vista, Apt. 7, Lynden, WA. Target Location 3 is a one-story single-family residence. The residence is tan in color with white trim, and composite roof. The residence appears to have a covered front door/entrance on the west side of the residence. The residence has a driveway, with access from the south, off E. 69th Vista. The number “7” is affixed to the south side of the residence in two separate locations, are both black in color, and visible from the driveway.

d. **Target Location 4 (TL4): 4238 Northwest Drive, Bellingham, WA**

98226: Target Location 4, as further described in Attachment A4, is located at 4238 Northwest Drive, Bellingham, WA. Target Location 4 is a one-story single-family residence, with what appears to be an unattached outbuilding to the north. The residence is grey in color with white trim, and composite roof. The residence has a covered front door/entrance located on the west side of the residence. The residence has a driveway with access from the east side of Northwest Drive. The numbers “4238” are affixed to the front of the actual residence, on the west side, and visible from the driveway as you enter the property. The numbers “4238” are white in color.

e. **Target Location 5 (TL5): 2412 Rimland Drive, Apt. 410, Bellingham, WA**

98226: Target Location 5, as further described in Attachment A5, is located at 2412 Rimland Drive, Apt. 410, Bellingham, WA. Target Location 5 is a fourth-floor apartment located within the Trailview Apartment building, located at 2412 Rimland Drive, Bellingham, WA. Target Location 5 is an apartment assigned number 410. There is a placard affixed to the left side of the front door that reads “410” in vertically descending numbers. The door front door has a grey metal door handle on the left side of the door.

f. **Target Location 6 (TL6): 1820 East Pole Road, Everson, WA**

98247: Target Location 6, as further described in Attachment A6, is located at 1820 East Pole Road, Everson, WA. Target Location 6 is a property located at 1820 East Pole Road,

1 Everson, WA. According to the Whatcom County Assessor website, the parcel number is
2 3903021580280000. There is a single-story residence on the property with brown siding.
3 On the south side of the residence, there are white numbers showing “1820” affixed to the
4 siding. There is a shop on the property with green metal siding and a green door. There are
5 multiple trailers and vehicles within the boundary of the property.

6 g. **Target Vehicle 3 (TV3): A blue 2006 Chevrolet Cobalt:** Target
7 Vehicle 3, as further described in Attachment A7, is a 2006 Chevrolet Cobalt, with Vehicle
8 Identification Number (VIN) 1G1AK15F967805540.¹

9 12. For each of the Target Locations, authority to search extends to all parts of
10 the property, including main structure, garage(s), storage structures, outbuildings, and
11 curtilage, and all vehicles, containers, compartments, or safes located on the property,
12 whether locked or not, where the items described in Attachment B could be found. For
13 each Target Location described as an apartment, authority to search extends to all storage
14 areas associated with the apartment, including on-site storage lockers, garages, and parking
15 stalls. For each Target Vehicle, authority to search extends to all parts of the vehicle and
16 any cases, containers, compartments, or safes located in the vehicle, whether locked or not,
17 where the items described in Attachment B could be found.

18 13. The facts set forth in this Affidavit are based on my own personal knowledge;
19 knowledge obtained from other individuals during my participation in this investigation,
20 including other law enforcement officers; interviews of cooperating witnesses; review of
21 documents and records related to this investigation; communications with others who have
22 personal knowledge of the events and circumstances described herein; and information
23 gained through my training and experience.

24
25 ¹ Investigators have observed that this vehicle has had multiple Washington State registrations,
26 with at least three different Washington license plates, during the period of this investigation. The
27 most recent registration for this vehicle was issued on May 30, 2023, and the Washington license
plate associated with this most recent registration is CHH1986.

14. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, fruits and instrumentalities of violations of Title 21, United States Code, Section 841(a)(1); conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and/or laundering of, or conspiracy to launder, monetary instruments in violation of Title 18, United States Code, Sections 1956(a) and (h), will be found at the Subject Premises and within the Subject Vehicle.

SOURCES OF INFORMATION

15. I make this Affidavit based upon personal knowledge derived from my participation in this investigation and upon information I believe to be reliable from the following sources, which include but are not limited to:

a. My training and experience investigating drug trafficking and related criminal activity, as described above;

b. Oral and written reports and documents about this and other investigations that I have received from agents of the DEA, the Whatcom County Sheriff's Office (WCSO), the Lynden Police Department (LPD), and other federal, state and local law enforcement agencies;

c. Physical and digital surveillance conducted by the aforementioned agencies, and other law enforcement agencies, that has been reported to me directly or indirectly;

d. Telephone toll records, pen register and trap and trace information, and subscriber information;

e. Washington State Department of Licensing records;

f. Commercial databases;

g. Public records; and

1 h. Publicly viewable information on social media websites (*i.e.*,
2 Facebook, Instagram).

3 16. In the following paragraphs, I describe communications between various
4 individuals. Except where specifically indicated with quotation marks, the descriptions are
5 summaries of the conversations and are not meant to reflect the specific words or language
6 used.

7 THE INVESTIGATION

8 Summary of Investigation

9 17. The United States, including the Drug Enforcement Administration and the
10 Whatcom County Sheriff's Office (WCSO), are conducting a criminal investigation into
11 Perfecto BARRAGAN MENDEZ, Gabriel BARRAGAN CHAVEZ, Jesus Geovanny
12 MONREAL BOJORQUEZ, Jose Manuel COTA GOMEZ, Christopher GARCIA, Joel
13 ARMENTA LOPEZ, and others, regarding violations of 21 U.S.C. §§ 841(a)(1) and 846,
14 and 18 U.S.C. §§ 1956(a) and (h).

15 18. Investigators believe that the subject drug trafficking organization ("DTO")
16 is distributing fentanyl in Whatcom County, WA. Investigators believe that the DTO is
17 using a network of stash houses, dispatchers, money launderers, and drug couriers to
18 distribute fentanyl to customers in Whatcom County, WA. Investigators believe drug
19 customers in Whatcom County, WA, communicate with a dispatcher, who investigators
20 believe is based in Mexico, to order controlled substance. Investigators believe that once
21 an order is placed using either a social media account or phone communication, a courier
22 based in Whatcom County, WA, meets with the customer to fulfil the order and accept
23 payment on behalf of the DTO.

24 19. Specifically, investigators have identified the following DTO members who
25 investigators believe are engaged in the drug trafficking and money laundering conspiracy:

26 a. **Jose COTA GOMEZ** is suspected of acting as a drug courier by
27 delivering controlled substances and accepting payments at the direction of a dispatcher in

1 Mexico. Jose COTA GOMEZ is suspected of living at **Target Location 1** and **Target**
2 **Location 5**, as well as selling drugs from **Target Location 2**. Investigators have not
3 identified a Washington State identification for COTA GOMEZ.

4 b. **Jesus MONREAL BOJORQUEZ** is suspected of acting as a drug
5 courier by delivering controlled substances and accepting payments at the direction of
6 dispatcher in Mexico. Jesus MONREAL BOJORQUEZ is suspected to be living at **Target**
7 **Location 6**. According to the Washington State Department of Licensing, MONREAL
8 BOJORQUEZ has a listed residential address at **Target Location 1**, last updated on July
9 7, 2023. Prior to that date, MONREAL BOJORQUEZ had **Target Location 6** listed as his
10 residential address.

11 c. **Perfecto BARRAGAN MENDEZ** is suspected of acting as a
12 facilitator for the DTO by transporting drugs, renting hotel rooms, re-registering vehicles,
13 and laundering money on behalf of the organization. Investigators believe Perfecto
14 BARRAGAN MENDEZ has resided at **Target Location 3**. According to the Washington
15 State Department of Licensing, BARRAGAN MENDEZ has a listed residential address at
16 **Target Location 3**, last updated on August 6, 2022.

17 d. **Gabriel BARRAGAN CHAVEZ** is suspected of acting as a
18 facilitator for the DTO by transporting drugs, registering and re-registering vehicles used
19 by members of the DTO, and laundering money for DTO. Investigators believe
20 BARRAGAN CHAVEZ resides at **Target Location 3** and has repeatedly used **Target**
21 **Location 4** as an address to register vehicles. According to the Washington State
22 Department of Licensing, BARRAGAN CHAVEZ has a listed residential address at
23 **Target Location 4**, last updated on February 24, 2021.

24 e. **Antonio BARRAGAN CHAVEZ** is suspected of acting as a
25 facilitator for the DTO by allowing his address, **Target Location 4**, to be used as an address
26 to register and re-register vehicles used by the DTO to distribute controlled substances.
27 Antonio BARRAGAN CHAVEZ is also suspected of assisting members of the DTO to

lease a rental property, **Target Location 2**, which is being used to distribute controlled substances. Investigators suspect, based on the frequent use of **Target Location 4's** address, as well as Antonio BARRAGAN CHAVEZ's role as a co-signer for **Target Location 2**, that Antonio BARRAGAN CHAVEZ may be a higher-ranking member of the DTO. According to the Washington State Department of Licensing, Antonio BARRAGAN CHAVEZ has listed his residential address as **Target Location 4**, last updated on February 20, 2021.

20. During the investigation law enforcement has observed multiple runners conducting drug transactions (or suspected drug transactions), using several of the same vehicles. Of note, the registration for these vehicles has been repeatedly changed.² Furthermore, as demonstrated by the table below, Perfecto BARRAGAN MENDEZ and Gabriel BARRAGAN CHAVEZ, two of the principal targets of this investigation, have each been the registered owner of Target Vehicles 1-3, at **Target Locations 3 or 4**, during the period of this investigation:

Vehicle	License	Date Observed	Registered Name	Registered Address
TV1	CEM9917	11/05/2022	Perfecto BARRAGAN MENDEZ	966 E. 69th Vista, Apt. 7, Lynden, WA (Target Location 3)
TV1	CEN1644	12/08/2022	Gabriel BARRAGAN CHAVEZ	4238 Northwest Drive, Bellingham, WA (Target Location 4)
TV2	CAJ2393	12/29/2022	Harrison Olvera	3232 Pine Road NE, Apt. A307, Bremerton, WA
TV2	CFT2201	01/03/2023	Gabriel BARRAGAN CHAVEZ	966 E. 69th Vista, Apt. 7, Lynden, WA

² Based on my training and experience, individuals that engage in the illicit distribution of controlled substances will sometimes re-register the same vehicle under a new name and with a new address. This tactic is referred to as "title-flipping" and is used as a means of evading law enforcement detection. Moreover, based upon my training and experience, the short term and frequent re-registrations of a vehicle indicates that the vehicle is owned by an organization, and not the individual registrant of the vehicle.

				(Target Location 3)
TV2	CFT3246	01/12/2023	Luis Barbosa Ortiz	1820 E. Pole Road, Everson, WA (Target Location 6)
TV2	CHG8071	04/10/2023	Sebastian CANO FRANCISCO	2010 Front Street, Trailer 6, Lynden, WA
TV2	CHG9547	04/18/2023	Perfecto BARRAGAN MENDEZ	966 E. 69th Vista, Apt. 7, Lynden, WA (Target Location 3)
TV3	CBZ2761	11/06/2022	Andres Felipe Matias Jeronimo	808 W 2nd Street, Apt. A, Nooksack, WA
TV3	CHG8098	04/18/2023	Perfecto BARRAGAN MENDEZ	966 E. 69th Vista, Apt. 7, Lynden, WA (Target Location 3)
TV3	CHH1986	05/31/2023	Gabriel BARRAGAN CHAVEZ	4238 Northwest Drive, Bellingham, WA (Target Location 4)
TV4	486YWO	06/13/2023	Lonnie and Jean McGee	7035 S 133rd Street, Unit A200, Seattle, WA
TV4	CHH2877	07/06/2023	Kelsey Winifred Slowey	5914 Roberts Road, Bellingham, WA

Traffic Stop of Joel ARMENTA LOPEZ on November 5, 2022

21. On November 5, 2022, a Lynden Police officer conducted a traffic stop of a gold 1999 Toyota Camry, bearing Washington license plate CEM9917 (hereafter “TV1”), for suspected driving under the influence (DUI). While attempting to stop TV1, the Lynden police officer saw unknown items/objects being thrown from the passenger side of the vehicle. Officers later located a large quantity of pills suspected of containing fentanyl in the area where items had been observed being thrown. Upon stopping TV1, officers identified the driver and sole occupant of TV1 as Joel ARMENTA LOPEZ. According to a search of a Washington DOL database, TV1 was issued Washington license plate

1 CEM9917 on October 19, 2022, and was registered to Perfecto BARRAGAN MENDEZ
2 at 966 E. 69th Vista, Apt. 7, Lynden, WA (TL3).

3 22. After being provided *Miranda* warnings, ARMENTA LOPEZ told officers
4 that he was staying at the Lynden Windmill Inn and that there would be cash and a large
5 amount of fentanyl pills/narcotics in his hotel room. ARMENTA LOPEZ further stated
6 that he had recently been moved to the area to sell drugs in Whatcom County, WA.
7 ARMENTA LOPEZ said he worked for a male in Mexico who directed him over the phone
8 to meet with local customers. ARMENTA LOPEZ further stated that he had previously
9 delivered, on multiple occasions, 200 to 300 fentanyl pills to an individual that he knew as
10 “Ricky.”

11 23. At the time ARMENTA LOPEZ was arrested, there was a GPS route that
12 was active on one of ARMENTA LOPEZ’s phones. The destination address was at, or in
13 the immediate vicinity of 1820 E. Pole Road, Everson, WA, i.e., the address for **Target**
14 **Location 6**. The contact in ARMENTA-LOPEZ’s phone associated with this address was
15 “Ricky.” As explained further herein, **Target Location 6** is a location with which
16 investigators are familiar based upon historical and recent drug related activity.

17 24. ARMENTA LOPEZ consented to a search of TV1. Law enforcement located
18 two cell phones, a suspected drug ledger notebook, a bag of suspected fentanyl-laced pills,
19 and plastic baggies. Law enforcement also located a bank receipt showing a cash deposit
20 receipt for \$5,000 from around November 2, 2022. The bank account receipt showed the
21 account was under the name “Perfecto Barragan Mendez” with an address of 966 E. 69th
22 Vista, Apt. 7, Lynden, WA (TL3).

23 25. In TV1, investigators also located two vehicle registrations that did not
24 appear to belong to TV1 in the vehicle. One registration was for a 1997 Honda Accord
25 (WA/CEE8910). The registration listed the registered owner as Jesus BARRAGAN
26 CHAVEZ at 4238 Northwest Drive, Bellingham, WA, i.e., the address for **Target**
27 **Location 4**.

26. ARMENTA LOPEZ consented to the search of the four devices seized from TV1 and the hotel room. Investigators later reviewed information found in some of those devices. Specifically, investigators found a WhatsApp message thread with a Mexico pre-fixed phone number on one of the devices. In that message thread, investigators saw photographs of several money remittance receipts. Investigators saw one receipt dated October 31, 2023, that listed the sender as “Gabriel BARRAGAN HERNANDEZ”³ with an address of 3010 Ferry Avenue, Bellingham, WA. That receipt was for \$1,615. Investigators saw another remittance receipt from October 30, 2022, with a sender listed as “Perfecto BARRAGAN MENDEZ” at 1674 Dodder Drive, Los Banos, CA. That receipt was for \$1,480. Both receipts listed recipients in Mexico.⁴

27. ARMENTA LOPEZ consented to the search of his hotel room at the Windmill Inn (Room 14). During the search of ARMENTA LOPEZ’s room, officers located approximately 25,000 blue pills suspected of containing fentanyl, approximately 150 grams of suspected fentanyl powder, two cellphones, and \$13,228 in United States currency. Investigators later received a report from a DEA laboratory which confirmed the presence of fentanyl in the seized pills. Investigators have not yet received forensic testing results for the suspected fentanyl powder.

Information Received from the Windmill Inn

28. After the traffic stop of ARMENTA LOPEZ on November 5, 2022, a police officer with the Lynden Police Department spoke with the managers of the Windmill Inn, where ARMENTA LOPEZ had been staying. Law enforcement was advised by hotel staff

³ Based upon the investigation to date, investigators believe that this may be another name used by Gabriel Barragan Chavez. However, investigators have not been able to confirm this belief.

⁴ Based on my training and experience, as well as information obtained in this investigation, I believe the deposit receipts located in TV1 and photographed in the cell phone relate to the transfer and laundering of illicit drug proceeds. Specifically, I know that Mexico-based DTOs use facilitators in the United States to receive/collect drug proceeds. Once the facilitators receive drug trafficking proceeds in the United States, they transfer these proceeds—via bank transfer, money remitting services, and/or smuggled bulk cash—to other DTO members.

1 that ARMENTA LOPEZ had checked in on November 5, 2022. A manager advised that
2 ARMENTA LOPEZ had been accompanied by another male when ARMENTA LOPEZ
3 was checking into the room. That male had left once he and ARMENTA LOPEZ had
4 obtained a room.

5 29. A Lynden Police officer returned to the Windmill Inn to speak further with
6 managers on November 6, 2022. The officer was provided with additional information.
7 Managers showed the officer scanned copies of identification cards for Perfecto
8 BARRAGAN MENDEZ and Christopher GARCIA. Hotel staff said that after law
9 enforcement had left the Windmill Inn on November 5, 2022, Perfecto BARRAGAN
10 MENDEZ had come to the Windmill Inn. BARRAGAN MENDEZ requested to pick up
11 items from ARMENTA LOPEZ's hotel room. Hotel staff said Christopher GARCIA had
12 also come to the Windmill Inn, claiming to be ARMENTA LOPEZ's brother. GARCIA
13 also asked to retrieve something from ARMENTA LOPEZ's room.

14 30. Investigators suspected that GARCIA and BARRAGAN MENDEZ had been
15 attempting to retrieve the drugs and/or U.S. currency from ARMENTA LOPEZ's hotel
16 room.

17 31. Hotel staff showed law enforcement a license plate number (WA/CBZ2761)
18 that they had written down and that they indicated was associated with BARRAGAN
19 MENDEZ. When law enforcement queried the license plate in law enforcement databases,
20 they learned that the plates belonged to a 2006 Chevrolet Cobalt registered to "Andres
21 MATIAS JERONIMO" at an address in Nooksack, WA. The vehicle had a VIN listed as
22 1G1AK15F967805540, i.e., the VIN for TV3.

23 Surveillance of TV1 on December 8, 2022

24 32. On December 8, 2022, at 1:00 pm,⁵ investigators saw TV1 arrive at a gas
25 station near Lynden, WA. Investigators observed a Hispanic male, later identified as Jesus
26

27 ⁵ All drug amounts, money amounts, and times provided in this affidavit are approximate.

1 Geovanny MONREAL BOJORQUEZ,⁶ driving TV1. Investigators noticed that TV1 was
2 bearing a new license plate, Washington license plate CEN1644. According to Washington
3 Department of Licensing, TV1 had been issued license plate CEN1644 on November 26,
4 2022. This new registration for TV1 was to Gabriel BARRAGAN CHAVEZ at 4238
5 Northwest Drive, Bellingham, WA (TL4).

6 33. Investigators watched as TV1 parked next to a gold 2000 Lexus SUV bearing
7 Washington license plate CCV2018. According to Washington DOL, the gold Lexus was
8 registered to Raymond Lee ROBISON at 316 S. Washington Street, Everson,
9 WA.

10 34. Moments after the arrival of TV1, investigators observed a Caucasian male,
11 later identified as Daniel John FAIX via a Washington DOL photograph, exit the front
12 passenger door of the gold Lexus. FAIX was carrying what appeared to be a cellular phone,
13 a water bottle, and a small tan leather handbag. Investigators observed FAIX walk up to
14 TV1 and enter the vehicle via the front passenger door. FAIX is known to investigators as
15 a local drug dealer in Whatcom County with criminal history that includes controlled
16 substance violation convictions in 2004, 2005, 2008, 2011, 2013, and 2015.

17 35. At 1:22 pm, investigators observed a male later identified as Raymond Lee
18 ROBISON sitting in the driver's seat of the gold Lexus. Investigators identified ROBISON
19 via a Washington DOL photograph. A criminal history check of ROBISON revealed that
20 in 2013, in Whatcom County, he was convicted for possession of a controlled substance
21 without prescription. ROBISON also has additional arrest history relating to the unlawful
22 possession of controlled substance(s).

23 36. At 1:24 pm, investigators observed FAIX exit the front passenger door of
24 TV1 and walk back to the front passenger side of the gold Lexus. Investigators later
25

26
27 ⁶ On December 14, 2022, investigators positively identified the driver of TV1 as Jesus Geovanny
MONREAL BOJORQUEZ via an immigration booking photo.

1 observed, via surveillance photographs, that FAIX was carrying a large item, or items, in
2 his front sweater pocket after exiting TV1.

3 37. Based on my training and experience, the events observed by investigators
4 on December 8, 2022, were indicative of an illicit drug transaction involving Jesus
5 Geovanny MONREAL BOJORQUEZ, the driver of TV1, and Daniel John FAIX. After
6 the suspected drug transaction between MONREAL BOJORQUEZ and FAIX,
7 investigators followed TV1, driven by MONREAL BOJORQUEZ, to 6069 Neevel Road,
8 Ferndale, WA (TL1).

9 38. Furthermore, on December 28, 2022, FAIX was contacted by law
10 enforcement during a separate drug investigation in Bellingham, WA. That contact
11 involved the seizure of approximately 4,000 blue pills marked “M” on one side and “30”
12 on the other side. Most of the blue pills seized from FAIX during this law enforcement
13 contact were seized from FAIX’s person.

14 39. On March 30, 2023, a federal arrest warrant was issued for Daniel FAIX by
15 the Honorable Mary Alice Theiler, U.S. Magistrate Judge for the Western District of
16 Washington. FAIX was arrested by federal investigators on April 4, 2023. During his
17 arrest, a search warrant was served on a motor home associated with FAIX, which resulted
18 in the seizure of large quantities of suspected methamphetamine, suspected fentanyl, U.S.
19 currency, as well as multiple firearms. During a post-*Miranda* interview, FAIX told
20 investigators that one of his sources of drug supply was a Facebook account under the name
21 “Juan.” FAIX said he would order drugs from “Juan” in Mexico, who would then dispatch
22 a local courier to deliver the drugs.

23 Identification of Target Vehicle 2 on December 29, 2022

24 40. On December 29, 2022, at 8:13 am, investigators observed a light green 2005
25 Mazda 6 (hereafter “Target Vehicle 2” or “TV2”) parked in between TV1 and a travel
26 trailer located on the west side of 6069 Neevel Road, Ferndale, WA (TL1). Investigators
27 observed TV2 bearing Washington license plate CAJ2393. According to Washington State

1 Department of Licensing, TV2 was registered to Harrison Olvera at 3232 Pine Road NE,
2 Apt. A307, Bremerton, WA.

3 41. At 1:18 pm, investigators observed TV2 depart the area of 6069 Neevel Road
4 (TL1). Investigators followed TV2 to a fast-food restaurant near Lynden, WA.
5 Investigators positively identified Jesus Geovanny MONREAL BOJORQUEZ as the
6 driver and sole occupant of TV2.

7 42. At 2:03 pm, investigators followed TV2 to back to 6069 Neevel Road,
8 Ferndale, WA (TL1), and observed MONREAL BOJORQUEZ appear to unlock and enter
9 a travel trailer located on the west end of the property.

10 Surveillance of TV2 on January 3, 2023, with New License Plate

11 43. On January 3, 2023, investigators observed TV2 departing the area of 6069
12 Neevel Road, Ferndale (TL1). During this surveillance, investigators noted that TV2 was
13 bearing a new license plate—Washington license plate CFT2201. According to
14 Washington DOL, TV2 was issued license plate CFT2201 on December 28, 2022, with
15 registration listed under Gabriel Barragan Chavez at 966 E. 69th Vista, Apt. 7, Lynden,
16 WA (TL3). Investigators recognized the name “Gabriel Barragan Chavez” as a previous
17 registered owner of TV1. When TV1 had been registered to “Gabriel Barragan Chavez,” it
18 had a listed address of 4238 Northwest Drive, Bellingham, WA (TL4).

19 44. At 12:51 pm, investigators followed TV2 to a parking lot in Bellingham,
20 WA. Moments after the arrival of TV2, investigators observed a male walk up to, and then
21 enter, the front passenger seat of TV2. The male was later identified as Zachary TRIPP.
22 TRIPP remained in TV2 for less than two minutes. Investigators then observed TRIPP exit
23 TV2 and return to a blue Chevrolet Blazer (the “blue Blazer”).

24 45. At 12:53 pm, investigators observed the blue Blazer depart the parking lot.
25 Investigators maintained constant surveillance of the blue Blazer after TRIPP’s meeting
26 with the occupant(s) of TV2. Investigators observed the blue Blazer arrive at a gas station
27 in Bellingham, WA, after meeting with TV2. Investigators then observed TRIPP exit the

1 blue Blazer and enter the gas station convenience store briefly. Investigators did not have
2 visual of TRIPP while he was in the convenience store. Minutes later, investigators
3 observed TRIPP exit the convenience store and enter the front passenger seat of the blue
4 Blazer. Investigators did not observe anyone approach the blue Blazer while it was parked
5 at the gas station.

6 46. At 1:35 pm, Whatcom County Sheriff's deputies contacted the occupants of
7 the blue Blazer. Scott STUART was identified as the driver of the blue Blazer and Zachary
8 TRIPP was identified as the front seat passenger. STUART granted deputies consent to
9 search the blue Blazer. During the search of the blue Blazer, investigators located and
10 seized one hundred blue pills—marked "M" on one side and "30" on the other side, drug
11 paraphernalia, and suspected powder fentanyl. Based on training and experience, I know
12 that the pills seized from the blue Blazer are consistent in appearance to other pills that
13 have tested positive for the presence of fentanyl.

14 47. Deputies spoke with TRIPP. TRIPP admitted to being a regular user of
15 fentanyl. TRIPP provided deputies with a bag of blue "M 30" pills from one of his pockets.
16 TRIPP said he purchased drugs through a Facebook account under the name "Juann
17 Hernandez" (Target Account 1). TRIPP showed deputies a messages thread with that
18 account, where TRIPP appeared to have ordered drugs that day. TRIPP told deputies he
19 did not think he had met with the user of the account, rather, TRIPP believed he met with
20 a local Hispanic male who acted as a "runner" for the user of Target Account 1.

21 Surveillance of Target Vehicle 2 on January 18, 2023

22 48. On the morning of January 18, 2023, the Honorable S. Kate Vaughan, U.S.
23 Magistrate Judge for the Western District of Washington, granted judicial authorization to
24 install a tracking device on TV2. At 10:59 am, investigators observed TV2 parked at 6069
25 Neevel Road, Ferndale, WA (TL1). At 11:45am, investigators observed TV2 depart the
26 area of the residence.

49. At 12:06 pm, investigators observed TV2 parked in a convenience store parking lot in Bellingham, WA. During this surveillance, investigators noted that TV2 was bearing a new license plate, Washington license plate CFT3246. According to Washington DOL, TV2 was issued license plate CFT3246 on January 12, 2023, with registration listed to Luis Barbosa Ortiz at 1820 E. Pole Road, Everson, WA (TL6).

50. At 12:24 pm, investigators observed a Hispanic male matching the description of MONREAL BOJORQUEZ walk away from the area of TV2 and up to the northern door of the travel trailer at 6069 Neevel Road, Ferndale, WA (TL1). Investigators observed the Hispanic male enter the travel trailer door and out of sight.

51. Given the change in license plate, investigators sought and received a second tracking warrant for TV2. *See* MJ23-025 (W.D. Wash. January 19, 2023). Investigators installed a tracking device on TV2 On January 19, 2023.

Controlled Purchase of M30 pills coordinated via Facebook Messenger on January 26, 2023

52. In January 2023, investigators from DEA Bellingham were contacted by investigators from the Bureau of Indian Affairs (BIA), who informed DEA investigators that a BIA confidential source (CS1)⁷ advised that he/she could purchase drugs from a subject known as “Juan” via Facebook Messenger.

⁷ CS1 started cooperating with the BIA in May 2021 in return for prosecutorial consideration regarding charges relating to the possession of controlled substances and the unlawful possession of a firearm. Shortly after CS1 began to cooperate with law enforcement, CS1 conducted a controlled purchase of suspected fentanyl pills. At the conclusion of the controlled purchase, CS1 was asked by investigators if he/she had taken any pills out of the bag CS1 had just purchased at law enforcement direction. CS1 initially told investigators that he/she had not taken any of the pills that he/she had received from the controlled purchase. Investigators then asked CS1 if there would be anything found in CS1’s vehicle. CS1 then informed investigators that there might be one pill in the vehicle. Investigators then located a pill on the front seat floorboard. Upon further questioning from law enforcement, CS1 then told investigators that there would be a second pill in the car, and this pill would be attached to aluminum foil. CS1 directed investigators to a piece of aluminum foil that contained a partially smoked pill, which was stuck to the foil. Both pills were seized by investigators and placed into evidence. BIA investigators discontinued the use of CS1 because of his/her lack of candor when initially asked if he/she had taken any of the pills from the

53. Notwithstanding CS1's prior documented deception, and significant criminal history, investigators used CS1 to conduct a controlled purchase with the user of the target Facebook Account (hereafter "TA1").

54. On January 26, 2023, investigators directed CS1 to place a call to TA1. The call was monitored by investigators and recorded. The call, which was answered by a male with broken English, lasted approximately forty-seven seconds and is described below:

TA1	Hey bro.
CS1	Amigo, where do I go?
TA1	Eh, go to truck taco Mexican.
CS1	Where?
TA1	Eh for smith. Meet in smith.
CS1	The taco truck?
TA1	Yeah big taco truck.
CS1	Where at?
TA1	Mexican.
CS1	By, by Laurel?

controlled buy and because of investigator concerns that CS1 may have an untreated substance use disorder.

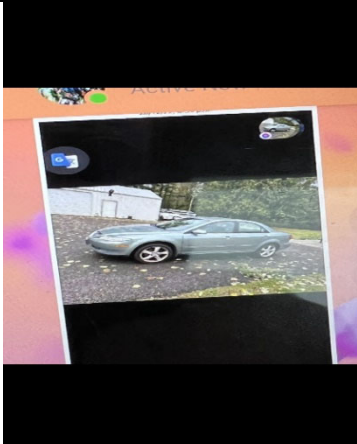
In addition to the deception noted during the controlled purchase in May 2021, CS1 has substantial criminal history, some of which specifically relates to crimes of dishonesty. CS1 has twelve felony convictions that relate to criminal impersonation, multiple controlled substance violations, residential burglary, possession of stolen property, theft, and taking a motor vehicle without permission. CS1 has eleven gross misdemeanor convictions that relate to obstruction of law enforcement, unlawful issuance of bank checks or drafts, and assault. CS1 has eight misdemeanor convictions that relate to bail jumping, driving with a suspended license, possession of drug paraphernalia, possession of a controlled substance, disorderly conduct, and refusal to provide information to a law enforcement officer. CS1 has one unclassified conviction that relates to damaging the property of another.

In January 2022, after CS1 had received substance abuse treatment, CS1 resumed cooperation with law enforcement. CS1 is now provided monetary compensation in return for his/her cooperation. CS1 is currently enrolled in a drug treatment program and has conducted five controlled purchases since January 2022 with no discrepancies.

TA1	Eh, it's for smith. I, I can send address.
CS1	K.
TA1	I send the address now ok?
CS1	K.
TA1	Ok.

55. In summary, the user of TA1 tells CS1 to meet at the taco truck located near the intersection of Smith Road and Guide Meridian Street. CS1 attempts to clarify where TA1 was directing CS1 to meet. TA1 tells CS1 that TA1 would provide the address to the meeting location.

56. CS1 then exchanged multiple messages with TA1 in the presence of, and at the direction of investigators. Excerpts of those messages are detailed below:

TA1	Hey.
CS1	I have 850. Where do I go?
TA1	Go in truck tacos Mexican for smith please.
CS1	K.
TA1	Smith n meridian. How much you want? \$850 ok.
CS1	Ya.
TA1	How many minutes?
CS1	15
TA1	

	He go in this car bro.
CS1	Ok.
TA1	Wat color ur car?
CS1	Silver.
CS1	Here.
TA1	Yes he almost to bro in 5 minutes or 4.

57. In summary, CS1 tells TA1 that he/she is looking to purchase \$850 of pills. TA1 tells CS1 to meet at the taco truck located near the intersection of Smith Road and Guide Meridian Street. TA1 confirms with CS1 that he/she is requesting \$850 worth of pills. CS1 confirms the amount with TA1. TA1 then asks CS1 when he/she will arrive at the taco truck. CS1 tells TA1 he/she will arrive in fifteen minutes. TA1 then sends a photograph of a light green sedan and tells CS1 that the person delivering the pills would be arriving in this vehicle.⁸ Upon arrival at the meet location, CS1 told TA1 that he was at the meet location, and TA1 indicated that the runner would arrive in 4-5 minutes.

58. Investigators then traveled, with CS1 in the investigators' vehicle,⁹ to the meeting location provided by TA1. Investigators were monitoring the tracking device on TV2, so they knew when to expect the arrival of TV2. Shortly, before the arrival of TV2 at the planned delivery location, investigators directed CS1 to exit investigators' vehicle.

59. Investigators then observed TV2 arrive in the parking lot near CS1's location. Investigators observed CS1 approach TV2 and enter the front passenger seat. Minutes later, investigators observed CS1 exit the front passenger seat of TV2 and walk directly towards investigators' vehicle. Upon returning to the investigators' vehicle, CS1 transferred custody of the pills purchased during the controlled transaction. Specifically,

⁸ Though I cannot confirm (because the license plate is not visible) the vehicle in this picture appears to be TV2.

⁹ Prior to releasing CS1 for this controlled buy, investigators searched CS1's person to ensure that he/she was not in possession of any controlled substances, weapons, or significant amounts of currency. Investigators maintained constant surveillance of CS1 during this controlled purchase.

1 CS1 provided a sandwich bag containing approximately 500 blue pills marked “M” on one
2 side and “30” on the other. These pills weighed approximately 63.70 grams (including the
3 plastic sandwich bag). Based on training and experience, I know that the pills purchased
4 by CS1 are consistent in appearance to other pills that have tested positive for the presence
5 of fentanyl.

6 60. During the controlled purchase, CS1 was equipped with both an audio and
7 video recording device. Investigators have reviewed the recordings from the controlled
8 purchase. During their review, investigators observed CS1 hand the buy money to
9 MONREAL BOJORQUEZ. After CS1 handed MONREAL BOJORQUEZ the buy money,
10 investigators then observed MONREAL BOJORQUEZ counting the funds provided by
11 CS1. Investigators then observed MONREAL BOJORQUEZ place the money into his left
12 pants pocket. MONREAL BOJORQUEZ then reached into the inside of his sweater and
13 retrieved a clear plastic sandwich bag containing blue pills.

14 DEA Undercover Purchases M30 Pills from MONREAL BOJORQUEZ in
15 February 2023

16 61. In February 2023, a DEA undercover (UC) arranged a controlled purchase
17 with a subject referred to as “Juan” via telephone. The DEA UC agreed to purchase \$5,000
18 worth of pills from “Juan”. “Juan” directed the DEA UC to a meeting location in
19 Bellingham, WA. At 12:18 pm, the DEA UC arrived at the meeting location.

20 62. At 12:36 pm, investigators observed TV2, bearing Washington license plate
21 CFT3246, depart 6069 Neevel Road, Ferndale, WA (TL1) via electronic surveillance.

22 63. At 12:43 pm, investigators observed TV2 arrive at the meet location and park
23 next to the DEA UC. Investigators observed the DEA UC exit the UC vehicle and get into
24 the front passenger seat of TV2.

25 64. At 12:45 pm, investigators observed the DEA UC exit the front passenger
26 door of TV2, get back into the DEA UC vehicle, and remain in the parking lot.

65. At 12:52 pm, investigators observed the DEA UC depart the meeting location. The DEA UC proceeded to a pre-determined debrief location in Bellingham, WA.

66. At 12:56 pm, investigators observed TV2 travelling west on Paradise Road, in the direction of 6069 Neevel Road, Ferndale, WA (TL1). Moments later, investigators observed TV2 arrive at 6069 Neevel Road (TL1) via electronic surveillance.

67. The DEA UC purchased 4,200 blue pills marked “M” on one side and “30” on the other. These pills weighed 557.25 grams (including packaging). The DEA UC identified MONREAL BOJORQUEZ as the individual who provided the pills the DEA UC. Based on training and experience, I know that the pills purchased by the DEA UC are consistent in appearance to other pills that have tested positive for the presence of fentanyl.

Surveillance of TV2 on April 10, 2023, with New License Plate

68. On April 10, 2023, at 12:06 pm, investigators observed TV2 depart 6069 Neevel Road, Ferndale, WA (TL1), via electronic surveillance. Investigators then observed TV2 parked at a gas station in Ferndale, WA. During this surveillance, investigators noted that TV2 was bearing a new license plate—Washington license plate CHG8071.¹⁰ According to Washington DOL, TV2 was issued license plate CHG8071 on March 29, 2023, with registration to Sebastian Cano Francisco at 2010 Front Street, Trailer 6, Lynden, WA (TL5). Investigators observed TV2 was occupied by a male driver wearing a baseball cap. Agents were not able to confirm whether the identity of the driver was, or was not, MONREAL BOJORQUEZ.

Surveillance of TV2 on April 18, 2023, and Identification of Jose COTA GOMEZ

69. On April 18, 2023, at 4:15 pm, investigators observed TV2 depart the area of **Target Location 1** via electronic surveillance. Investigators then observed TV2 parked

¹⁰ TV2 was previously assigned Washington license plate CFT3246 with registration to Luis Barbosa Ortiz at 1820 E. Pole Road, Everson, WA (TL5). According to Washington DOL records, the registration for CHG8071 (new TV2 license plate) and CFT3246 (old TV2 license plate) relate to the same vehicle, as the vehicle identification number associated with both the new and old registration was the same.

1 at a market named Abarrotes La Gloria Market, located at 5974 Guide Meridian Road,
2 Bellingham, WA. Investigators saw TV2 was bearing another new license plate, which was
3 CHG9547. According to Washington DOL, TV2 was issued license plate CHG9547 on
4 April 12, 2023, with registration to Perfecto Barragan Mendez at 966 E. 69th Vista, Apt.
5 7, Lynden, WA (TL3).

6 70. Investigators noted that a previously unidentified male (later identified as
7 Jose Manuel COTA GOMEZ) was the driver of TV2. Investigators observed COTA
8 GOMEZ enter and exit the Abarrotes La Gloria Market several times before returning to
9 TV2 and repositioning TV2 in the parking lot of the market.

10 71. Following the repositioning of TV2, investigators observed Perfecto
11 BARRAGAN MENDEZ drive into the parking lot of the market in a blue Chevrolet Cobalt
12 bearing Washington license plate CHG8098. A check of that WA DOL records indicated
13 that vehicle was registered to Perfecto BARRAGAN-MENDEZ at 966 E. 69th Vista, Apt.
14 7, Lynden, WA (TL3). Investigators noticed the vehicle identification number (VIN)
15 matched the VIN for TV3, which had previously been assigned license plate CBZ2761.
16 WA DOL records indicated the new registration had been issued on April 5, 2023.

17 72. Investigators observed BARRAGAN MENDEZ exit TV3 and get into the
18 driver's seat of TV2, as COTA GOMEZ moved over to the passenger seat. Investigators
19 observed TV2 depart the market parking lot, and maintained electronic surveillance of TV2
20 as it traveled to La Gloria Market, located at 4140 Meridian Street, Bellingham, WA.

21 73. At 5:38 pm, investigators observed COTA GOMEZ and BARRAGAN
22 MENDEZ exit TV2 and enter La Gloria Market at 4140 Meridian Street, Bellingham, WA.
23 After a few minutes in the store, investigators observed COTA GOMEZ and BARRAGAN
24 MENDEZ reenter TV2 and depart the area. A later review of judicially authorized tracking
25 information showed TV2 returned to the area of **Target Location 1**.

26 74. Investigators were aware, based on their training and experience, that both
27 Abarrotes La Gloria Market (5974 Meridian Street, Bellingham, WA) and La Gloria

1 Market (4140 Meridian Street, Bellingham, WA) were grocery stores that both offered
2 money remitting services. Investigators knew, based on their training and experience, that
3 such money remitter services are commonly used by drug traffickers to remit drug proceeds
4 to Mexico from the United States.

5 Identification of Target Location 2 on April 21, 2023

6 75. On April 21, 2023, investigators monitored the judicially authorized GPS
7 tracking device that had been installed on TV2. Investigators saw that at 10:10 am, TV2
8 left the area of **Target Location 1** and drove towards Bellingham, WA.

9 76. At 10:17 am, investigators physically observed TV2 parked in the parking
10 lot of the Sunset Pond Apartments located at 1401 Woodstock Way, Bellingham, WA. TV2
11 was parked near Building H, which is the Building in the Sunset Pond Apartments where
12 **Target Location 2** is located.

13 77. At 10:40 am, investigators saw COTA GOMEZ get out of TV2 carrying a
14 white box. COTA GOMEZ walked out of view. Investigators could not see which
15 apartment COTA GOMEZ accessed, but noted he walked in the direction of units 101H,
16 102H, 103H, and 104H (Unit 102H is **TL2**). After about five minutes, plainclothes
17 investigators saw COTA GOMEZ, still carrying the white box, walk back to TV2 and drive
18 from the area.

19 Information Regarding Target Location 2

20 78. On May 10, 2023, investigators spoke with two managers of the Sunset Pond
21 Apartments. The managers of the apartment complex advised investigators that Sunset
22 Pond Apartment employees had reported suspicious activity in relation to Unit 102H, i.e.,
23 **Target Location 2**. The employees believed the suspicious activity was drug related.

24 79. In response to an administrative subpoena, managers of the Sunset Pond
25 Apartments provided information related to the current occupants of **Target Location 2**.
26 The rental application for the current occupants of **Target Location 2** was signed by Lucio
27 Mauricio CORTEZ BARRAGAN, Jesus BARRAGAN CHAVEZ, and Antonio

1 BARRAGAN CHAVEZ. The proposed move-in date listed on these documents was
2 October 22, 2022, with a one-year rental term. The records included scanned copies of
3 Washington State driver's licenses and/or identification cards of the three individuals. Both
4 Jesus BARRAGAN CHAVEZ and Antonio BARRAGAN CHAVEZ had the address of
5 4238 Northwest Drive, Bellingham, WA (TL4), listed on their scanned driver's licenses.
6 Antonio BARRAGAN CHAVEZ appeared to be listed as a co-signer, not a tenant, on the
7 application.

8 DEA Undercover Purchases M30 Pills from COTA GOMEZ in May 2023

9 80. In May 2023, a DEA UC arranged a controlled purchase with a subject
10 referred to as "Juan" via telephone. The DEA UC contacted "Juan" utilizing the same
11 telephone number from the previous controlled purchase in February 2023. The DEA UC
12 also recognized "Juan," via his voice, as the same individual who arranged this previous
13 controlled purchase. The DEA UC agreed to purchase \$4,000 worth of pills from "Juan."
14 "Juan" directed the DEA UC to a meeting location in Bellingham, WA.

15 81. At 11:07 am on the date of the purchase, investigators observed the DEA UC
16 arrive and park at the prearranged meeting location.

17 82. At 11:19 am, investigators watched as TV2 departed the area of 6069 Neevel
18 Road, Ferndale, WA (TL1), via the judicially authorized GPS tracking device that had
19 been installed on TV2.

20 83. At 11:27 am, investigators saw TV2 arrive at the meeting location bearing
21 Washington license plate CHG9547. Investigators observed COTA GOMEZ exit TV2 and
22 get into the front passenger seat of the DEA UC vehicle. Approximately one minute later,
23 investigators observed COTA GOMEZ exit the DEA UC vehicle and briefly re-access
24 TV2, before returning to the DEA UC vehicle.

25 84. COTA GOMEZ remained in the DEA UC vehicle for a brief time before
26 investigators observed him exit the DEA UC vehicle. The DEA UC departed the parking
27 lot and was followed by investigators to a pre-determined location in Bellingham, WA.

1 The DEA UC later confirmed the purchase of approximately 4,000 blue pills marked “M”
2 on one side and “30” on the other from COTA GOMEZ. These pills weighed 482 grams
3 (including packaging). Based on training and experience, investigators recognized that the
4 pills purchased by the DEA UC were consistent in appearance to other pills that have tested
5 positive for the presence of fentanyl.

6 85. Investigators maintained surveillance of COTA GOMEZ after the
7 undercover controlled purchase. After appearing to purchase food from a food truck located
8 in the same parking where the deal had occurred, investigators observed COTA GOMEZ
9 depart the area driving TV2. With the assistance of aerial surveillance, investigators
10 watched as TV2 returned to 6069 Neevel Road, Ferndale, WA (TL1).

11 COTA GOMEZ Conducts Suspected Drugs Transactions at Target Location 2 on
12 May 23, 2023

13 86. On May 23, 2023, at 3:30 pm, investigators were monitoring judicially
14 authorized GPS information related to TV2. Investigators saw that TV2 was in the area of
15 **Target Location 2**. Investigators then traveled to the area of **Target Location 2**.

16 87. At 3:40 pm, investigators saw COTA GOMEZ standing at the front of TV2
17 with the hood up. COTA GOMEZ appeared to be doing mechanical work on the vehicle.

18 88. At 4:19 pm, investigators watched a black Chevrolet Equinox, bearing
19 Washington license plate 112ZKB, arrive and park near COTA GOMEZ and TV2. A
20 female exited the passenger’s seat of Chevrolet Equinox and appeared to greet COTA
21 GOMEZ near TV2.

22 89. After greeting each other, investigators watched as COTA GOMEZ took a
23 key out of his pocket and unlocked the door to Unit 102H at 1401 Woodstock Way,
24 Bellingham, WA (TL2). COTA GOMEZ went inside while the female waited near TV2.

25 90. About three minutes later, COTA COMEZ emerged from **Target Location**
26 **2**. COTA GOMEZ and the female then entered TV2. The vehicle did not move. After about
27 two minutes, COTA GOMEZ and the female exited TV2. The female walked to the

1 Chevrolet Equinox, reentered the passenger's seat, and the Chevrolet Equinox departed the
2 area. A records check through the Washington State DOL of the Chevrolet Equinox
3 showed it was registered to Jared LANKHAAR. According to law enforcement records,
4 LANKHAAR has two felony convictions related to Possession of a Controlled Substance
5 from 2005 and 2019.

6 91. Investigators continued to watch COTA GOMEZ. At 4:30 pm, investigators
7 saw a Nissan Murano bearing Washington license plate CHG9074 arrive and park near
8 TV2. An unidentified male walked from the Nissan Murano and entered the passenger seat
9 of TV2. COTA GOMEZ entered the front driver's seat. Again, the vehicle did not move.
10 After about two minutes, the unidentified male exited TV2, reentered the passenger's seat
11 of the Nissan Murano, and the Nissan Murano departed the area. According to Washington
12 State DOL, the Nissan Murano was registered to Christopher ZOROTOVICH. According
13 to law enforcement databases, ZOROTOVICH has five felony convictions related to
14 controlled substance violations, which included Manufacture/Delivery of a Controlled
15 Substance, Possession of a Controlled Substance with Intent to Deliver, and Possession of
16 a Controlled Substance. These convictions occurred in 2009, 2008, 2005, and 2004.

17 92. Investigators suspected, based on their training and experience, that COTA
18 GOMEZ's interactions with the occupants of the Chevrolet Equinox and the Nissan
19 Murano were drug transactions.

20 93. At 5:21 pm, investigators observed COTA GOMEZ exit **Target Location 2**,
21 enter TV2, and leave the area. COTA GOMEZ appeared to purchase items from a nearby
22 gas station before returning to the Sunset Pond Apartments. Upon his return, investigators
23 observed COTA GOMEZ as he reentered **Target Location 2**.

24 Surveillance of COTA GOMEZ and BARRAGAN MENDEZ on May 31, 2023

25 94. On May 31, 2023, investigators began watching TV2, which was parked at
26 Perfecto BARRAGAN MENDEZ's residence located at 966 E. 69th Vista, Apt. 7, Lynden,
27 WA (TL3).

1 95. At 12:50 pm, investigators observed BARRAGAN MENDEZ depart the area
2 of **Target Location 3** driving TV2. Investigators followed TV2 to La Gloria Market
3 located at 4140 Meridian Street, Bellingham, WA. Investigators observed BARRAGAN
4 MENDEZ park TV2 in the parking lot of La Gloria Market and remain in the driver's seat
5 of TV2 with the driver's window partially rolled down.

6 96. At 1:32 pm, investigators observed Jose COTA GOMEZ enter the front
7 passenger's seat of TV2. Investigators did not observe COTA GOMEZ's arrival in the
8 parking lot of La Gloria Market prior to him entering TV2.¹¹ Once COTA GOMEZ entered
9 TV2, investigators observed BARRAGAN MENDEZ roll up the open window of TV2.
10 Once the window of TV2 was closed, investigators observed BARRAGAN MENDEZ and
11 COTA GOMEZ as they sat in TV2. Investigators observed both BARRAGAN MENDEZ
12 and COTA GOMEZ looking down towards the center console area of TV2.

13 97. At 1:37 pm, investigators observed COTA COMEZ exit TV2 and enter the
14 driver's seat of **TV3** and depart the parking lot. Investigators saw that **TV3** was bearing a
15 new license plate—Washington plate CHH1986. According to Washington DOL records,
16 the registration was listed to Gabriel BARRAGAN CHAVEZ at 4238 Northwest Drive,
17 Bellingham, WA (**TL4**). Washington DOL records indicated that plate was issued on May
18 30, 2023. Investigators did not follow **TV3**, as they maintained surveillance of TV2 and
19 BARRAGAN MENDEZ.

20 98. Immediately following the departure of COTA GOMEZ in **TV3**,
21 investigators observed BARRAGAN MENDEZ exit TV2 and walk towards the entrance
22 of La Gloria Market.

23
24 ¹¹ Following the observation of **TV3** at La Gloria Market on May 31, 2023, investigators reviewed
25 remote video camera footage of 6069 Neevel Road, Ferndale, WA. Video camera footage revealed
26 a vehicle matching the description of **TV3** depart 6069 Neevel Road (**TL1**) at 1:09 pm on May 31,
27 2023. Based upon a review of Google Maps, the approximate drive-time from 6069 Neevel Road,
Ferndale, WA (**TL1**), to La Gloria Market is fourteen minutes. As such, investigators believe that
COTA GOMEZ departed from 6069 Neevel Road, Ferndale, WA (**TL1**) in **TV3** prior to meeting
with BARRAGAN MENDEZ at La Gloria Market.

1 99. At 1:46 pm, investigators observed BARRAGAN MENDEZ return to TV2
2 from La Gloria Market. Investigators then observed BARRAGAN MENDEZ
3 photographing receipts, utilizing a cell phone, while he sat in TV2. Based on their training
4 and experience, investigators were aware that the La Gloria Market at that location is
5 frequently used by drug traffickers to remit drug proceeds to sources of supply in Mexico
6 and elsewhere. Based upon my training and experience, I also known that drug traffickers
7 frequently photograph money remittance receipts and send these photographs as proof of
8 payment.

9 100. Investigators suspected that as they were observing BARRAGAN MENDEZ
10 and COTA GOMEZ looking at the center console of TV2, they were reconciling amounts
11 owed to their supplier and amounts that would be retained for their profit. Investigators
12 believe that BARRAGAN MENDEZ used the money transfer services of La Gloria to remit
13 payment to his and COTA GOMEZ's supplier.

14 101. At 1:46 pm, investigators followed BARRAGAN MENDEZ as he drove
15 away from that area. Investigators watched as BARRAGAN MENDEZ drove TV2 to a
16 pipe fittings manufacturing facility, where it remained out of view for about five minutes.

17 102. At 2:14 pm, investigators watched as TV2 parked in front of a Whatcom
18 Educational Credit Union bank located at 2045 Front Street, Lynden, WA. Gabriel
19 BARRAGAN CHAVEZ exited the front passenger seat of TV2, and went inside of the
20 Whatcom Educational Credit Union bank. Gabriel BARRAGAN CHAVEZ returned to
21 TV2 about ten minutes later.

22 103. At 2:27 pm, investigators saw BARRAGAN MENDEZ park TV2 in front of
23 the Mixteca Group Money Services store, located at 8174 Guide Meridian Road, Lynden,
24 WA. Investigators observed BARRAGAN MENDEZ as he walked toward the store.

25 104. At 2:49 pm, investigators observed BARRAGAN MENDEZ and Gabriel
26 BARRAGAN CHAVEZ walking away from the Mixteca Group Money Services store.
27 Both Gabriel BARRAGAN CHAVEZ and BARRAGAN MENDEZ were holding papers

1 in their hands. Investigators were aware, based on their training and experience, that the
2 Mixteca Group Money Services offered money remitter services that could be used to remit
3 money to third parties, including third parties residing outside of the United States.

4 Surveillance of COTA GOMEZ and Gabriel BARRAGAN CHAVEZ on June 13,
5 2023

6 105. On June 13, 2023, investigators were conducting surveillance in the area of
7 **Target Location 1**. At 1:15 pm, investigators saw **TV3** parked in the area of COTA
8 GOMEZ's trailer.

9 106. At 1:47 pm, investigators saw COTA GOMEZ walk out of **Target Location**
10 **1**, and walk to a green 2002 Toyota Camry, bearing Washington license plate 486YWO
11 (hereafter "Target Vehicle 4" or "TV4"),¹² that was parked nearby. COTA GOMEZ
12 accessed TV4, grabbed an item, and then returned to his trailer (**TL1**).

13 107. At 1:51 pm, investigators saw COTA GOMEZ leave **Target Location 1**, and
14 depart the area in TV4. COTA GOMEZ returned to **Target Location 1** at 2:25 pm. COTA
15 GOMEZ left in TV4 again at 2:33 pm, returning to **Target Location 1** at 3:09 pm. At 3:33
16 pm, COTA GOMEZ again departed from the area of **Target Location 1** driving TV4.
17 Investigators followed COTA GOMEZ and TV4.

18 108. Investigators watched as COTA GOMEZ drove to 966 E. 69th Vista, Apt. 7,
19 Lynden, WA (**TL3**). Investigators noted that while COTA GOMEZ was driving from
20 **Target Location 1** to **Target Location 3**, he made several driving maneuvers that
21 investigators recognized as being consistent with counter-surveillance. These maneuvers
22 including taking an indirect route and making an abrupt U-turn.

23
24
25 ¹² According to the Washington DOL, that plate was registered to Lonnie and Jean MCGEE at
26 7035 S 133rd Street, Unit A200, in Seattle, WA. However, the DOL databases also indicated the
27 vehicle had been reported as sold on January 5, 2023, with a new owner listed as Francisco
BERDUO at 15232 SE 272nd Street, Unit 66, Kent, WA.

1 109. After arriving at **Target Location 3**, TV4 remained parked for only a few
2 minutes before leaving. Investigators noticed that COTA GOMEZ had picked up a
3 passenger at that location. This passenger was later identified as Gabriel BARRAGAN
4 CHAVEZ.

5 110. Investigators watched as TV4 parked at a strip mall parking lot in Everson,
6 WA. Investigators observed COTA GOMEZ and Gabriel BARRAGAN CHAVEZ walk
7 towards the storefronts on foot. Soon after, investigators saw COTA GOMEZ and Gabriel
8 BARRAGAN CHAVEZ returning to TV4. COTA GOMEZ and Gabriel BARRAGAN
9 CHAVEZ appeared to be followed by a third Hispanic male individual, later identified via
10 a Washington State Department of Licensing photograph as Sebastian CANO
11 FRANCISCO. CANO FRANCISCO walked to a nearby white 2012 Nissan Titan pickup
12 truck, bearing Washington license plate D13004A.

13 111. Investigators followed the Nissan Titan pickup truck. Investigators noticed
14 the Nissan Titan pickup truck appeared to be taking indirect routes, and was travelling well
15 below the posted speed limit. Concerned the driver of the Nissan Titan pickup truck was
16 conducting counter-surveillance, investigators discontinued surveillance.

17 112. Investigators later obtained video surveillance from the strip mall in Everson,
18 WA, during the time COTA GOMEZ, Gabriel BARRAGAN CHAVEZ, and Sebastian
19 CANO FRANCISCO were in that area. While reviewing the footage, law enforcement
20 observed COTA GOMEZ, Gabriel BARRAGAN CHAVEZ, and CANO FRANCISCO
21 enter the Valley Drug store located in Everson, WA. Investigators learned there was a WA
22 State Driver's Licensing Office located inside that store. Investigators observed on the
23 video surveillance as COTA GOMEZ appeared to take money from his pocket and count
24 it before returning it to his pocket. Shortly after, all three individuals went to the WA State
25 Driver's Licensing Officer desk, where CANO FRANCISCO and Gabriel BARRAGAN
26 CHAVEZ appeared to exchange paperwork with the employee behind the licensing
27 counter.

113. While investigators have not confirmed which vehicle Gabriel BARRAGAN CHAVEZ and CANO FRANCISCO were registering on this date, this behavior was noteworthy to investigators given that during the period of Gabriel BARRAGAN CHAVEZ and CANO FRANCISCO had both been the registered owners of TV2. That COTA GOMEZ—one of the DTO’s current runners—accompanied Gabriel BARRAGAN CHAVEZ and CANO FRANCISCO to the licensing office on this date, further confirmed investigator’s belief that this activity related to the drug trafficking activities discussed herein.

Traffic Stop of Perfecto BARRAGAN MENDEZ and Gabriel BARRAGAN CHAVEZ on June 21, 2023

114. On June 21, 2023, uniformed troopers with WSP were conducting routine traffic patrol in the area of the Guide Meridian Road near Bellingham, WA. Troopers observed TV2, bearing Washington license plate CHG9547, driving in that area.

115. A WSP trooper conducted a traffic stop of TV2 based on illegal window tint. Another WSP trooper in the area had noted that TV2 appeared to have briefly met with another vehicle in a nearby parking lot, and suspected drug activity.

116. The driver of TV2 was identified as Perfecto BARRAGAN MENDEZ. The passenger was identified as Gabriel BARRAGAN CHAVEZ. A trooper noticed a beer can in the back seat of TV2 and the odor of intoxicants coming from the vehicle. Suspecting that BARRAGAN MENDEZ was under the influence of alcohol, troopers requested to obtain a portable breath test sample. The presumptive result provided by BARRAGAN MENDEZ showed he had alcohol present on his breath, but was under the legal driving limit for Washington State.

117. During the stop, a trooper observed a backpack in the vehicle. When asked,¹³

¹³ WSP troopers communicated with BARRAGAN MENDEZ and Gabriel BARRAGAN CHAVEZ in Spanish, using a combination of app-based translation programs and a phone translation service.

1 Perfecto BARRAGAN MENDEZ initially stated that the bag belonged to his passenger,
2 Gabriel BARRAGAN CHAVEZ.

3 118. A trooper asked Perfecto BARRAGAN MENDEZ for consent to search
4 TV2. BARRAGAN MENDEZ agreed, and law enforcement searched the vehicle. In the
5 backpack, law enforcement located approximately \$1,560 U.S. currency, approximately
6 two thousand pills suspected of containing fentanyl, and several individual baggies of a
7 white powdery substance, also suspected of containing fentanyl.

8 119. After law enforcement located the suspected controlled substances, Perfecto
9 BARRAGAN MENDEZ then told investigators that the items in the bag belonged to him—
10 not to Gabriel BARRAGAN CHAVEZ as he had previously indicated. BARRAGAN
11 MENDEZ indicated that he was holding the items for a friend, whom he identified as
12 “Jose.” In the context of this investigation, investigators believe that BARRAGAN
13 MENDEZ was referring to Jose COTA GOMEZ.

14 120. During the stop and subsequent search of BARRAGAN MENDEZ, Gabriel
15 BARRAGAN CHAVEZ, and TV2, troopers located and seized three digital devices.
16 Specifically, investigators seized a Samsung brand cell phone cell phone from the person
17 of Gabriel BARRAGAN CHAVEZ; a Samsung brand cell phone from TV2; and an Apple
18 iPhone brand cell phone from the person of Perfecto BARRAGAN MENDEZ. Gabriel
19 BARRAGAN CHAVEZ and Perfecto BARRAGAN MENDEZ were released following
20 the traffic stop.

21 121. WSP troopers contacted investigators with the DEA and transferred the three
22 cell phones to DEA investigators. Investigators later obtained a federal search warrant for
23 those devices. *See* MJ23-332 (W.D. Wash. June 27, 2023). Among the digital evidence
24 located in those devices, investigators found photographs of money remittance receipts
25 with destinations in Mexico on a device belonging to Perfecto BARRAGAN MENDEZ.

26 122. In a device belonging to Gabriel BARRAGAN CHAVEZ, investigators
27 located a WhatsApp message thread with a contact named “Toño B”. The message thread

1 did not display any messages. Investigators saw a photo linked to that WhatsApp account
2 that displayed a family and/or friends-type photo that appeared to include Antonio
3 BARRAGAN CHAVEZ. Investigators found a contact saved to the device with the same
4 phone number linked to the WhatsApp account under the name “Toño B”. Investigators
5 recognized Antonio BARRAGAN CHAVEZ as a resident of **Target Location 4**,¹⁴ as well
6 as the co-signer for the apartment at **Target Location 2**. Investigators also observed
7 photographs of money remittance receipts saved to Gabriel BARRAGAN CHAVEZ’s
8 device.

9 123. On the same date, following the traffic stop, investigators watched remotely
10 recorded video surveillance footage with a view of **Target Location 3**. Investigators
11 watched as Perfecto BARRAGAN MENDEZ returned to Target Location 3. Via remote
12 video, investigators observed BARRAGAN MENDEZ enter **Target Location 3**. After
13 remaining in **Target Location 3** for approximately fifteen minutes, investigators observed
14 BARRAGAN MENDEZ exit **Target Location 3**. BARRAGAN MENDEZ then entered
15 TV2 and drove away. Investigators observed tracker information as it drove around
16 Whatcom County, Washington. Investigators saw TV2 make a short visit to Everson, WA,
17 and then drive to the general area of La Gloria Market, located at 4140 Meridian Street,
18 Bellingham, WA. After about twenty minutes, TV2 returned to **Target Location 3**.
19 According to remotely recorded video footage, TV2 remained parked in front of Target
20 Location 3 for about two hours. During that time, both Perfecto BARRAGAN MENDEZ
21 and Gabriel BARRAGAN CHAVEZ could be seen speaking on cell phones in front of the
22 residence.

23
24
25 ¹⁴ Investigators were aware, based on a review of Whatcom County Assessor’s Office information,
26 that Antonio BARRAGAN and Elizabeth BARRAGAN were listed as owners of **Target Location**
27 **4**. On December 16, 2022, investigators had driven by that address and observed two vehicles
registered to Antonio BARRAGAN CHAVEZ parked in the address.

1 124. At 9:17 pm, Perfecto BARRAGAN MENDEZ got into TV2 and drove from
2 the area. BARRAGAN MENDEZ did not, based on the remotely recorded footage, appear
3 to pack any significant belongings prior to leaving. Over the following day, investigators
4 monitored judicially authorized vehicle tracker information for TV2 which showed that the
5 vehicle drove south through Washington, Oregon, and California.

6 125. On June 22, 2023, at 7:00 pm, location information indicated TV2 parked in
7 Los Banos, California. Investigators noted the tracker information showed that the vehicle
8 was parked approximately one block away from 1674 Dodder Drive, Los Banos, CA. As
9 noted above, this address was the address listed on a money remittance receipt seized
10 during the traffic stop of Joel ARMENTA LOPEZ on November 5, 2022. The date on this
11 remittance receipt was October 30, 2022, with sender "Perfecto BARRAGAN MENDEZ."

12 126. Investigators noted that on July 8, 2023, at 10:34 am, remotely recorded
13 video footage showed a male matching the appearance of Gabriel BARRAGAN CHAVEZ
14 leaving the area of the front door of **Target Location 3**, indicating to investigators the
15 property was still being utilized by members of the drug trafficking organization.

16 Identification of Target Location 5

17 127. Investigators have been monitoring judicially authorized location
18 information associated with **TV3**. Based upon GPS location information for TV3, as well
19 as the physical surveillance discussed above, investigators believe that **TV3** has been
20 primarily used by COTA GOMEZ since in or about April 2023.

21 128. During the end of June 2023, investigators saw that location information for
22 **TV3** indicated that the vehicle began to spend a significant amount of time around 2412
23 Rimland Drive, Bellingham, WA (**TL5**). Investigators saw that **TV3** began to spend the
24 night parked near **Target Location 5**. Specifically, since June 26, 2023 (AT **TL5**
25 overnight), through July 12, 2023, investigators saw that TV3 remained parked in the
26 vicinity of **Target Location 5** overnight, or for a significant amount of the nighttime hours,
27

1 on approximately fourteen occasions. During this same period of time, tracking data
2 indicated that **TV3** was also still making frequent visits to **Target Location 1**.

3 129. On June 20, 2023, investigators had physically observed **Target Vehicle 3**
4 parking in the area of **Target Location 5**. After parking **Target Vehicle 3** across the street,
5 investigators watched as COTA GOMEZ walked towards the front entrance of the
6 apartment complex located at 2412 Rimland Drive, Bellingham, WA, where **Target**
7 **Location 5** is located. COTA GOMEZ walked towards the area of the front entrance before
8 investigators lost sight of COTA GOMEZ.

9 130. On July 4, 2023, investigators reviewed judicially authorized location
10 information for **TV3** and noted that **TV3** had been parked in the area of **Target Location**
11 **5**. At about 2:51 pm, location information indicated **TV3** drove from that area to **Target**
12 **Location 1**. After arriving at **Target Location 1**, the location information indicated **TV3**
13 made several short trips to other addresses around Whatcom County, returning to **Target**
14 **Location 1** each time. The activity was consistent, based on the training and experience of
15 investigators, with **TV3** conducting drug transactions, and then returning to **Target**
16 **Location 1**. At approximately 8:15 pm, investigators observed **TV3** appeared to have
17 returned to the area of **Target Location 5**.

18 131. On July 5, 2023, investigators went to the apartment building at 2412
19 Rimland Drive, Bellingham, WA. Investigators spoke with a building manager at that
20 location, who provided information regarding that location, including surveillance footage
21 showing the interior and exterior of the building.

22 132. Investigators reviewed footage from July 4, 2023, and compared it with the
23 tracking information from **TV3**. As discussed above, investigators knew that **TV3** had
24 arrived in the area of **Target Location 5** at around 8:15 pm on July 4, 2023. Based upon
25 their review of the video, investigators observed that at 8:21 pm, a male matching the
26 description of Jose COTA GOMEZ walked up to, and sat on a bench, near the front door
27

1 2412 Rimland Drive, Bellingham, WA. The male's face was obscured by a hat, but his
2 physical appearance was consistent with COTA GOMEZ's height, weight, and hair color.

3 133. Approximately five minutes later, the surveillance showed an apparently
4 uninvolved male use a proximity card to access the apartment complex. The male suspected
5 to be COTA GOMEZ appeared to enter in the doorway before the door closed behind that
6 person. Investigators suspected COTA GOMEZ likely did not have a keycard and had been
7 waiting to walk in behind a key-holding resident.

8 134. Investigators watched on recorded surveillance video as the male suspected
9 to be COTA GOMEZ went to the fourth floor and appeared to wait in front of Room 410.
10 After a short time, COTA GOMEZ entered Room 410. It was unclear, based on the video,
11 if he was let in or accessed the room with a key.

12 135. The building manager provided rental records associated with Room 410
13 (**Target Location 5**). Room 410 had been rented since December 2022 to a female named
14 Karla CHAVEZ MONTOYA. According to the building manager, CHAVEZ
15 MONTOYA¹⁵ was living at **Target Location 5** with her young daughter. The building
16 manager indicated that COTA GOMEZ was not listed on the rental contract.

17 136. On July 13, 2023, investigators reviewed video footage—again provided by
18 the management for the Trailview Apartment complex—and compared it with the tracking
19 information from **TV3**. Investigators noted that **TV3** had left the area of **Target Location**
20 **5** at 11:59 am on July 10, 2023. **TV3** appeared to travel to a nearby grocery store parking
21 lot where it stayed for about ten minutes.

22
23
24 ¹⁵ A search of law enforcement databases indicated Karla Chavez Montoya had felony convictions
25 including Robbery in the 2nd Degree, Bail Jumping, and Identity Theft in the 2nd Degree.
26 Investigators noted that she had prior arrests for Manufacture/Delivery/Possess with Intent of
27 Controlled Substance (2016) and Possession of a Controlled Substance (2017 and 2018). Some of
those arrests resulted in related convictions that were later vacated under *State v. Blake*, 481 P. 3d
521 (Wash. 2021)

1 137. At 12:15 pm, tracking information showed that **TV3** returned to the area of
2 the Trailview Apartments. Based upon their review of the video, investigators observed
3 that at 12:19 pm, COTA GOMEZ could be seen walking to the front entrance doors of the
4 apartment complex. COTA GOMEZ appeared to remove a key card from his pocket, which
5 he used to open the exterior door. Subsequent video showed COTA GOMEZ entering
6 Apartment 410 (**TL5**).

7 Drug Related Traffic Stops Involving Jesus MONREAL BOJORQUEZ and Target
8 Location 6 – January 2023 and June 2023

9 138. On January 10, 2023, a Whatcom County Sheriff's Office deputy conducted
10 a traffic stop on TV2 after it was observed visiting 1820 East Pole Road (**TL6**) for
11 approximately five minutes. The registered owner of the vehicle at that time, Gabriel
12 BARRAGAN CHAVEZ, did not have a valid driver's license. The driver was identified as
13 Jesus MONREAL BOJORQUEZ. MONREAL BOJORQUEZ told law enforcement he
14 lived at **Target Location 6**. MONREAL BOJORQUEZ consented to a search of his
15 person, and law enforcement located approximately \$400 in his wallet, and approximately
16 \$50 in his pocket. A narcotics detection canine was deployed around the vehicle, and
17 alerted to the odor of narcotics coming from in or around TV2. MONREAL BOJORQUEZ
18 consented to a search of the vehicle. Law enforcement located a small quantity of suspected
19 drug paraphernalia.

20 139. On June 25, 2023, a Whatcom County Sheriff's Office deputy conducted a
21 traffic stop on a vehicle in the area of East Pole Road in Bellingham, WA. The vehicle was
22 stopped by law enforcement for a traffic violation, as well as an expired registration. The
23 driver of the vehicle was identified as Jesus MONREAL BOJORQUEZ based upon his
24 Washington State driver's license. According to the Washington State Department of
25 Licensing, MONREAL BOJORQUEZ had listed his residential address as 1820 E. Pole
26
27

1 Road, Everson, WA (TL6) on a driver's license, which had been issued February 16,
2 2023.¹⁶

3 140. Deputies asked MONREAL BOJORQUEZ for consent to search his vehicle,
4 which he granted. Deputies located a single suspected "M 30" stamped fentanyl-laced pill
5 in MONREAL BOJORQUEZ' pocket. Deputies also located over \$800 in U.S. currency
6 in MONREAL BOJORQUEZ' pocket. MONREAL BOJORQUEZ had three cell phones
7 in his possession, which he told deputies were for work, pleasure, and calling his wife.

8 Additional Drug Related Activity Involving Target Location 6

9 141. On October 24, 2022, law enforcement had responded to a death
10 investigation at **Target Location 6**. During that investigation, a 50-year-old female was
11 found to be deceased. A later Medical Examiner's report indicated the victim had died due
12 to fentanyl and methamphetamine intoxication.

13 142. On June 10, 2023, a Whatcom County Sheriff's Office deputy conducted a
14 traffic stop on a vehicle that had been seen leaving **Target Location 6**. The deputy
15 observed the vehicle cross over a fog-line while driving. The driver was identified as Luis
16 ORTIZ, a resident of **Target Location 6**. During that traffic stop, ORTIZ stated there were
17 no drugs in the vehicle, but was aware his female passenger like to use methamphetamine.
18 Law enforcement spoke with the female passenger, who provided a deputy with a small
19 baggie of suspected fentanyl-laced powder. The female denied the drugs had come from
20 **Target Location 6**.

21 143. On June 11, 2023, a Whatcom County Sheriff's Office deputy conducted a
22 traffic stop in the area of Everson, WA. The law enforcement report did not list the reason
23 for the traffic stop. The driver was identified as Chase JONES. The deputy recognized a
24 passenger in the vehicle as Luis FERNANDEZ, who appeared to be attempting to hide his
25

26
27 ¹⁶ As noted above, as of July 7, 2023, Jesus MONREAL MOJORQUEZ's updated residential
address with Washington DOL is 6069 Neevel Road, Ferndale, WA (TL1).

1 identity by covering his face with a bandana. He was found to have an active arrest warrant
2 for a felony offense. While speaking to the deputy, JONES said he had just picked up
3 FERNANDEZ from **Target Location 6**. FERNANDEZ consented to a search of his
4 person, and the deputy located approximately 21.5 grams of suspected methamphetamine
5 on his person, as well as approximately six suspected fentanyl-laced pills.

6 144. On June 16, 2023, a Whatcom County Sheriff's Office deputy saw a vehicle
7 being driven in the area of East Pole Road. The deputy recognized the driver as Rogelio
8 RAMIREZ from previous contacts. RAMIREZ had a suspended driver's license, and was
9 stopped by law enforcement. RAMIREZ was detained and provided *Miranda* warnings. A
10 female with documented narcotics history was also in the vehicle. A law enforcement
11 narcotics detection canine was deployed around the vehicle, and alerted to odor of narcotics
12 in or around the vehicle. RAMIREZ provided consent for law enforcement to search the
13 vehicle, and a small quantity of suspected fentanyl and suspected methamphetamine were
14 located. RAMIREZ denied the drugs had come from **Target Location 6**.

15 145. On June 17, 2023, a Whatcom County Sheriff's Office deputy stopped a
16 vehicle in Whatcom County, WA, for an equipment violation. The driver was identified as
17 Roderick PULLAR, who was recognized by local law enforcement as having drug history.
18 When asked if he was in possession of any drugs, PULLAR provided law enforcement
19 with a bag of a white crystalline substance which appeared consistent with
20 methamphetamine. PULLAR told law enforcement that he had purchased the
21 methamphetamine from Rickey PERALEZ at **Target Location 6**.

22 146. On June 23, 2023, a Whatcom County Sheriff's Office deputy stopped and
23 talked with a male they had seen stumbling in the roadway during hours of darkness in the
24 area of 1900 E. Pole Road, Everson, WA. The male, who was identified as Sindick Jimmy,
25 provided the deputy with drug paraphernalia he had on his person. Jimmy told law
26 enforcement he had been "sick," and had just purchased \$15-worth of fentanyl at **Target**
27 **Location 6**, which he had since used. Investigators noticed that JIMMY had been contacted

1 during 2021 by law enforcement at 5914 Roberts Road, Bellingham, WA, the current
2 registered address for Target Vehicle 4.

3 147. On July 1, 2023, a Whatcom County Sheriff's Office deputy observed a
4 vehicle they recognized as being associated with Luis ORTIZ driving in Whatcom County,
5 WA. The deputy recognized the vehicle as associated with **Target Location 6**. The vehicle
6 abruptly pulled into an agricultural field and turned off its lights. The deputy approached
7 the vehicle and saw suspected drug paraphernalia inside the vehicle. Law enforcement
8 recognized the driver as Luis ORTIZ and the passenger as Renee PHAIR. Both ORTIZ and
9 PHAIR consented to a search of their vehicle, and a small quantity of suspected
10 methamphetamine was located in the vehicle.

11 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

12 148. Based upon my training and experience, and my discussions with other
13 experienced officers and agents experienced in drug and money laundering investigations,
14 I know the following:

15 a. During the execution of search warrants, it is common to find papers,
16 letters, billings, documents, and other writings that show ownership, dominion, and control
17 of vehicles, residences, and/or storage units.

18 b. It is common for drug dealers to secrete contraband, proceeds of drug
19 sales, and records of drug transactions in secure locations within their vehicles, residences,
20 and/or storage units for their ready access and to conceal them from law enforcement.

21 c. Narcotics traffickers maintain books, records, receipts, notes, ledgers,
22 airline tickets, money orders, and other papers relating to the transportation, ordering, sale,
23 and distribution of controlled substances. Narcotics traffickers commonly "front," that is,
24 provide on consignment, controlled substances to their clients. These books, records,
25 receipts, notes, and ledgers, commonly known as "pay and owe sheets," are maintained
26 where traffickers have ready access to them.

1 d. Traffickers of controlled substances, and those who assist them,
2 maintain and tend to retain accounts or records of their drug trafficking activities, including
3 lists of drug quantities and money owed, telephone records including contact names and
4 numbers, photographs, and similar records of evidentiary value. These items are generally
5 kept in locations where drug traffickers believe their property is secure and will remain
6 undetected from law enforcement, such as inside their homes and vehicles. Sometimes,
7 these locations are not their primary residence, but instead used for the purposes of storing
8 and distributing drugs.

9 e. Traffickers of controlled substances commonly maintain records
10 reflecting names or nicknames, addresses, vehicles, and/or telephone numbers of their
11 suppliers, customers and associates in the trafficking organization. Traffickers commonly
12 maintain this information in books or papers as well as in cellular telephones and other
13 electronic devices. Traffickers often maintain cellular telephones for ready access to their
14 clientele and to maintain their ongoing narcotics business. Traffickers frequently change
15 their cellular telephone numbers to avoid detection by law enforcement, and it is common
16 for traffickers to use more than one cellular telephone at any one time.

17 f. Traffickers maintain evidence of their criminal activity at locations
18 that are convenient to them, including their residences and vehicles. This evidence often
19 includes more than contraband and paraphernalia and includes financial records, records
20 of property and vehicle ownership, records of property rented, records of storage facilities
21 used to hide drugs or currency, and other documentary evidence relating to commission of,
22 and proceeds from, their crimes. Narcotics traffickers sometimes take or cause to be taken
23 photographs and/or video recordings of themselves, their associates, their property, and
24 their illegal product, or have photo or video security systems that record images from their
25 homes or property. These individuals usually maintain these photographs and recordings
26 in their possession or at their premises, in a safe place. Such evidence may be kept at a safe
27

1 location for a long time after the drug deal(s) to which they pertain are completed, if the
2 location remains under the control of the trafficker.

3 g. Traffickers frequently maintain items necessary for weighing,
4 packaging, and cutting drugs for distribution. This paraphernalia often includes, but is not
5 limited to, scales, plastic bags and other packaging materials, sifters, containers, and
6 cutting/diluting agents and items to mask the odor of narcotics. Persons trafficking and
7 using controlled substances frequently sell more than one type of controlled substance at
8 any one time.

9 h. It is common for drug dealers to also be users of their product, and it
10 is common for drug users to maintain paraphernalia associated with the use of controlled
11 substances, such as syringes, pipes, spoons, containers, straws, and razor blades.

12 i. Traffickers frequently maintain records, books, notes, ledgers, travel
13 documents, and other papers relating to the transportation and distribution of controlled
14 substances in locations convenient to them, such as their residences and vehicles.

15 j. Traffickers often maintain weapons, including firearms and
16 ammunition, in secure locations such as their residences and vehicles, in order to protect
17 their drugs and drug proceeds.

18 k. Traffickers often have false identification documents and
19 identification documents in the names of others. Traffickers very often place assets in
20 names other than their own, or use fictitious names and identification, to avoid detection
21 of these assets by government agencies, while continuing to use these assets and exercise
22 dominion and control over them.

23 l. Drug trafficking is a cash business, often involving large amounts of
24 cash at any one time, so drug traffickers often have money counters.

25 m. A common method that drug traffickers use to distribute drugs is
26 through the use of passenger vehicles. Similarly, the proceeds of the sales of drugs are
27 sometimes transported back in the same manner. Vehicles used by drug traffickers are often

1 placed in fictitious or nominee names, and outfitted with concealed compartments where
2 the drugs and drug proceeds can be hidden to lessen the likelihood of interdiction.

3 n. Persons involved in drug trafficking conceal in their residences caches
4 of drugs, large amounts of currency, financial instructions, precious metals, jewelry, and
5 other items of value and/or proceeds of drug transactions as well as evidence of financial
6 transactions relating to obtaining, transferring, secreting, or the spending of large sums of
7 money made from engaging in narcotics trafficking activities.

8 o. Unexplained wealth is probative evidence of crimes motivated by
9 greed, in particular, trafficking in controlled substances.

10 p. Illegal drug trafficking is a continuing activity over months and even
11 years. Illegal drug traffickers will repeatedly obtain and distribute controlled substances on
12 a somewhat regular basis, much as any distributor of a legitimate commodity would
13 purchase stock for sale, and, similarly, drug traffickers will have an “inventory,” which
14 fluctuates in size depending upon various factors, including the demand and supply for the
15 product. I would expect the trafficker to keep records of their illegal activities for a period
16 of time extending beyond the time during which they actually possess illegal controlled
17 substances, in order that they can maintain contact with his criminal associates for future
18 drug transactions, and so that they can have records of prior transactions for which, for
19 example, they might still be owed money, or might owe someone else money. These
20 records are often created in code.

21 q. Drug trafficking is a cash business, and in order to escape notice from
22 authorities for using unexplained income, or hide excessive cash from illegal activities,
23 traffickers either keep large quantities of cash at home or other secure locations, such as
24 safe deposit boxes, or convert the cash into other valuable assets, such as jewelry, precious
25 metals, monetary instruments, or other negotiable forms of wealth. Records of such
26 conversions are often stored where a trafficker lives or in other secure locations such as
27 safe deposit boxes.

1 r. Money launderers often have banking records to include, but not
2 limited to, deposit or withdrawal slips, bank statements, checks, or money orders. These
3 items can be found in residences, vehicles, storage units, cellular phones, digital devices,
4 among other locations. Some of these banking records may not be in their own name.
5 Money launderers often have several accounts documented in some form, or instructions
6 detailing how to handle each respective account. For example, they may have a list of
7 accounts belonging to several different people with instructions for how much to deposit
8 or withdraw from each and often maintain this information for long periods of time in their
9 residences or safe deposit boxes.

10 s. Money launderers often have records or evidence related to how the
11 proceeds were spent or concealed and often maintain this information for long periods of
12 time in their residences or safe deposit boxes. Evidence may include jewelry and/or
13 vehicles, as well as the contents of storage lockers, safe deposit boxes or bank accounts.
14 The use of bank accounts is a common money movement technique used by drug
15 traffickers to receive payment for narcotics from customers outside of their geographic
16 region. It is common for a trafficker to use several bank accounts for this purpose
17 simultaneously in an attempt to avoid detection by the financial institutions and/or law
18 enforcement. The use of multiple accounts, and the commingling of illicit funds with
19 legitimate funds in particular, is often part of the plan to conceal the illegal activity or may
20 be part of the overall integration mechanism by which the illicit funds are made to appear
21 as part of the legitimate income so that only a small portion of or even none of the funds
22 from an account are seized.

23 t. I know from my training and experience that Mexico-based DTOs
24 frequently use various wire-remitter services and multiple senders to transfer money in
25 relatively small increments to multiple recipients. DTOs employ such tactics in an effort
26 to avoid triggering mandatory financial-reporting requirements of the wire-remitter
27 operators and to avoid law enforcement detection. I also know from my training and

1 experience that Mexico-based DTOs often use such wire transfers in order to quickly move
2 a small portion of drug proceeds out of the United States and into the possession of DTO
3 operatives and leadership in Mexico, with the bulk of the cash drug proceeds to follow
4 later.

5 u. Based on my training and experience, I know that international money
6 transfers among DTO members can be made through various digital money transfer
7 services utilizing internet-connected digital devices such as desktop and laptop computers.
8 In addition, those digital devices can be used by DTO members to access, store, send, and
9 receive records related to such international money transfers. Accordingly, internet-
10 connected digital devices owned or used by DTO members could harbor evidence of
11 money laundering.

12 149. Based on my training and experience, and that of other investigators I have
13 talked to, I also know that drug dealers use cellular telephones as a tool or instrumentality
14 in committing their criminal activity, to include laundering their proceeds. They use them
15 to maintain contact with their suppliers, distributors, and customers. They prefer cellular
16 telephones because, first, they can be purchased without the location and personal
17 information that land lines require. Second, they can be easily carried to permit the user
18 maximum flexibility in meeting associates, avoiding police surveillance, and traveling to
19 obtain or distribute drugs. Third, they can be passed between members of a drug conspiracy
20 to allow substitution when one member leaves the area temporarily. Since cellular phone
21 use became widespread, every drug dealer I have contacted has used one or more cellular
22 telephones for his or her drug business. I also know that it is common for drug traffickers
23 to retain in their possession phones that they previously used, but have discontinued
24 actively using, for their drug trafficking business. These items may be kept for months and
25 months in a safe place controlled by the drug trafficker. Based on my training and
26 experience, the data maintained in a cellular telephone used by a drug dealer is evidence of
27 a crime or crimes. This includes the following:

1 a. The assigned number to the cellular telephone (known as the
2 mobile directory number or MDN), and the identifying telephone serial number (Electronic
3 Serial Number, or ESN), (Mobile Identification Number, or MIN), (International Mobile
4 Subscriber Identity, or IMSI), or (International Mobile Equipment Identity, or IMEI) are
5 important evidence because they reveal the service provider, allow us to obtain subscriber
6 information, and uniquely identify the telephone. This information can be used to obtain
7 toll records, to identify contacts by this telephone with other cellular telephones used by
8 co-conspirators, to identify other telephones used by the same subscriber or purchased as
9 part of a package, and to confirm if the telephone was contacted by a cooperating source.

10 b. The stored list of recent received, missed, and sent calls is
11 important evidence. It identifies telephones recently in contact with the telephone user.
12 This is valuable information in a drug investigation because it will identify telephones used
13 by other members of the organization, such as suppliers, distributors, and customers, and
14 it confirms the date and time of contacts. If the user is under surveillance, it identifies what
15 number he called during or around the time of a drug transaction or surveilled meeting.
16 Even if a contact involves a telephone user not part of the conspiracy, the information is
17 helpful (and thus is evidence) because it leads to friends and associates of the user who can
18 identify the user, help locate the user, and provide information about the user. Identifying
19 a defendant's law-abiding friends is often just as useful as identifying his drug-trafficking
20 associates.

21 c. Stored text messages are important evidence, similar to stored
22 numbers. Agents can identify both drug associates, and friends of the user who likely have
23 helpful information about the user, his location, and his activities.

24 d. Drug traffickers increasingly use applications on smart phones
25 that encrypt communications such as WhatsApp, or applications that automatically delete
26 messages, such as Snapchat, in order to avoid law enforcement monitoring or recording of
27 communications regarding drug trafficking and/or money laundering. Evidence of the use

1 of such applications can be obtained from smart phones, and is evidence of a smart phone
2 user's efforts to avoid law enforcement detection.

3 e. Photographs on a cellular telephone are evidence because they
4 help identify the user, either through his or her own picture, or through pictures of friends,
5 family, and associates that can identify the user. Pictures also identify associates likely to
6 be members of the drug trafficking organization. Some drug dealers photograph groups of
7 associates, sometimes posing with weapons and showing identifiable gang signs. Also,
8 digital photos often have embedded "geocode" or GPS information embedded in them.
9 Geocode information is typically the longitude and latitude where the photo was taken.
10 Showing where the photo was taken can have evidentiary value. This location information
11 is helpful because, for example, it can show where coconspirators meet, where they travel,
12 and where assets might be located.

13 f. Stored address records are important evidence because they
14 show the user's close associates and family members, and they contain names and
15 nicknames connected to phone numbers that can be used to identify suspects.

16 TECHNICAL TERMS

17 150. Based on my training and experience, I use the following technical terms to
18 convey the following meanings:

19 a. IP Address: The Internet Protocol address (or simply "IP address") is
20 a unique numeric address used by computers on the Internet. An IP address looks like a
21 series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178).
22 Every digital device attached to the Internet must be assigned an IP address so that Internet
23 traffic sent from and directed to that digital device may be directed properly from its source
24 to its destination. Most Internet service providers control a range of IP addresses. Some
25 computers have static-that is, long-term-IP addresses, while other computers have
26 dynamic-that is, frequently changed-IP addresses.

27 b. Internet: The Internet is a global network of computers and other

1 electronic devices that communicate with each other. Due to the structure of the Internet,
 2 connections between devices on the Internet often cross state and international borders,
 3 even when the devices communicating with each other are in the same state.

4 c. Electronic Storage media: Electronic Storage media is any physical
 5 object upon which data can be recorded. Examples include hard disks, RAM, floppy disks,
 6 flash memory, CD-ROMs, and other magnetic or optical media.

7 **COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS**

8 151. As described above and in Attachment B, this application seeks permission
 9 to search for evidence, fruits, and/or instrumentalities that might be found at the Subject
 10 Premises or in the Subject Vehicle, in whatever form they are found. One form in which
 11 the evidence, fruits, and/or instrumentalities might be found is data stored on digital
 12 devices¹⁷ such as computer hard drives or other electronic storage media.¹⁸ Thus, the
 13 warrant applied for would authorize the seizure of digital devices or other electronic storage
 14 media or, potentially, the copying of electronically stored information from digital devices
 15 or other electronic storage media, all under Rule 41(e)(2)(B).

16 152. *Probable cause.* Based upon my review of the evidence gathered in this
 17 investigation, my review of data and records, information received from other agents and
 18 computer forensics examiners, and my training and experience, I submit that if a digital
 19 device or other electronic storage media is found at the Subject Premises or within the
 20 _____

21 ¹⁷ “Digital device” includes any device capable of processing and/or storing data in electronic
 22 form, including, but not limited to: central processing units, laptop, desktop, notebook or tablet
 23 computers, computer servers, peripheral input/output devices such as keyboards, printers,
 24 scanners, plotters, monitors, and drives intended for removable media, related communications
 25 devices such as modems, routers and switches, and electronic/digital security devices, wireless
 26 communication devices such as mobile or cellular telephones and telephone paging devices,
 27 personal data assistants (“PDAs”), iPods/iPads, Blackberries, digital cameras, digital gaming
 devices, global positioning satellite devices (GPS), or portable media players

¹⁸ Electronic Storage media is any physical object upon which electronically stored information
 can be recorded. Examples include hard disks, RAM, floppy disks, flash memory, CD-ROMs, and
 other magnetic or optical media.

1 Subject Vehicle, there is probable cause to believe that evidence, fruits, and/or
2 instrumentalities of the crimes of Title 21, United States Code, Section 841(a)(1);
3 conspiracy to distribute controlled substances, in violation of Title 21, United States Code,
4 Sections 841(a)(1) and 846; and/or laundering of, or conspiracy to launder, monetary
5 instruments in violation of Title 18, United States Code, Sections 1956(a) and (h), will be
6 stored on those digital devices or other electronic storage media. Specifically, I believe
7 digital devices, including cellular telephones, are being used to coordinate and conduct
8 drug trafficking transactions as detailed throughout this affidavit. I further believe that
9 targets of this investigation are using social media platforms, including Facebook, to
10 conduct these transactions. As discussed herein, investigators believe that drug trafficking
11 transactions are being directed by Mexico-based coconspirators and executed by
12 Washington-based runners. All the controlled purchases of narcotics conducted in this
13 investigation have been completed by using a digital device to communicate with the
14 targets of this investigation. There is, therefore, probable cause to believe that evidence,
15 fruits and/or instrumentalities of the crimes of Title 21, United States Code, Section
16 841(a)(1); conspiracy to distribute controlled substances, in violation of Title 21, United
17 States Code, Sections 841(a)(1) and 846; and/or laundering of, or conspiracy to launder,
18 monetary instruments in violation of Title 18, United States Code, Sections 1956(a) and
19 (h), exists and will be found on digital device or other electronic storage media at the
20 Subject Premises or within the Subject Vehicle, for at least the following reasons:

21 a. Based my knowledge, training, and experience, I know that computer
22 files or remnants of such files may be recovered months or even years after they have been
23 downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files
24 downloaded to a storage medium can be stored for years at little or no cost. Even when
25 files have been deleted, this information can sometimes be recovered months or years later
26 with forensics tools. This is because when a person “deletes” a file on a computer, the data
27 contained in the files does not actually disappear; rather, that data remains on the storage

1 medium until it is overwritten by new data.

2 b. Therefore, deleted files, or remnants of deleted files, may reside in
3 free space or slack space—that is, in space on the storage medium that is not currently
4 being used by an active file—for long periods of time before they are overwritten. In
5 addition, a computer’s operating system may also keep a record of deleted data in “swap”
6 or “recovery” files.

7 c. Wholly apart from user-generated files, computer storage media—in
8 particular, computers’ internal hard drives—contain electronic evidence of how a computer
9 has been used, what it has been used for, and who has used it. To give a few examples, this
10 forensic evidence can take the form of operating system configurations, artifacts from
11 operating system or application operation, file system data structures, and virtual memory
12 “swap” paging files. Computer users typically do not erase or delete this evidence, because
13 special software is typically required for that task. However, it is technically possible to
14 delete this information.

15 d. Similarly, files that have been viewed via the Internet are sometimes
16 automatically downloaded into a temporary Internet directory or “cache.”

17 153. *Forensic evidence.* As further described in Attachment B, this application
18 seeks permission to locate not only computer files that might serve as direct evidence of
19 the crimes described on the warrant, but also for forensic electronic evidence that
20 establishes how digital devices or other electronic storage media were used, the purpose of
21 their use, who used them, and when. There is probable cause to believe that this forensic
22 electronic evidence will be on any digital devices or other electronic storage media located
23 at the Subject Premises or in the Subject Vehicle because:

24 a. Stored data can provide evidence of a file that was once on the digital
25 device or other electronic storage media but has since been deleted or edited, or of a deleted
26 portion of a file (such as a paragraph that has been deleted from a word processing file).
27 Virtual memory paging systems can leave traces of information on the digital device or

1 other electronic storage media that show what tasks and processes were recently active.
2 Web browsers, e-mail programs, and chat programs store configuration information that
3 can reveal information such as online nicknames and passwords. Operating systems can
4 record additional information, such as the history of connections to other computers, the
5 attachment of peripherals, the attachment of USB flash storage devices or other external
6 storage media, and the times the digital device or other electronic storage media was in use.
7 Computer file systems can record information about the dates files were created and the
8 sequence in which they were created.

9 b. As explained herein, information stored within a computer and other
10 electronic storage media may provide crucial evidence of the “who, what, why, when,
11 where, and how” of the criminal conduct under investigation, thus enabling the United
12 States to establish and prove each element or alternatively, to exclude the innocent from
13 further suspicion. In my training and experience, information stored within a computer or
14 storage media (e.g., registry information, communications, images and movies,
15 transactional information, records of session times and durations, internet history, and anti-
16 virus, spyware, and malware detection programs) can indicate who has used or controlled
17 the computer or storage media. This “user attribution” evidence is analogous to the search
18 for “indicia of occupancy” while executing a search warrant at a residence. The existence
19 or absence of anti-virus, spyware, and malware detection programs may indicate whether
20 the computer was remotely accessed, thus inculcating or exculpating the computer owner
21 and/or others with direct physical access to the computer. Further, computer and storage
22 media activity can indicate how and when the computer or storage media was accessed or
23 used. For example, as described herein, computers typically contain information that log:
24 computer user account session times and durations, computer activity associated with user
25 accounts, electronic storage media that connected with the computer, and the IP addresses
26 through which the computer accessed networks and the internet. Such information allows
27 investigators to understand the chronological context of computer or electronic storage

1 media access, use, and events relating to the crime under investigation.¹⁹ Additionally,
2 some information stored within a computer or electronic storage media may provide crucial
3 evidence relating to the physical location of other evidence and the suspect. For example,
4 images stored on a computer may both show a particular location and have geolocation
5 information incorporated into its file data. Such file data typically also contains information
6 indicating when the file or image was created. The existence of such image files, along
7 with external device connection logs, may also indicate the presence of additional
8 electronic storage media (e.g., a digital camera or cellular phone with an incorporated
9 camera). The geographic and timeline information described herein may either inculcate
10 or exculpate the computer user. Last, information stored within a computer may provide
11 relevant insight into the computer user's state of mind as it relates to the offense under
12 investigation. For example, information within the computer may indicate the owner's
13 motive and intent to commit a crime (e.g., internet searches indicating criminal planning),
14 or consciousness of guilt (e.g., running a "wiping" program to destroy evidence on the
15 computer or password protecting/encrypting such evidence in an effort to conceal it from
16 law enforcement).

17 c. A person with appropriate familiarity with how a digital device or
18 other electronic storage media works can, after examining this forensic evidence in its
19 proper context, draw conclusions about how the digital device or other electronic storage
20 media were used, the purpose of their use, who used them, and when.

21 d. The process of identifying the exact files, blocks, registry entries,
22 logs, or other forms of forensic evidence on a digital device or other electronic storage
23 media that are necessary to draw an accurate conclusion is a dynamic process. While it is
24

25 ¹⁹ For example, if the examination of a computer shows that: a) at 11:00am, someone using the
26 computer used an internet browser to log into a bank account in the name of John Doe; b) at
27 11:02am the internet browser was used to download child pornography; and c) at 11:05 am the
internet browser was used to log into a social media account in the name of John Doe, an
investigator may reasonably draw an inference that John Doe downloaded child pornography.

possible to specify in advance the records to be sought, digital evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

e. Further, in finding evidence of how a digital device or other electronic storage media was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.

154. Because of the nature of the evidence that I am attempting to obtain and the nature of the investigation, I have not made any prior efforts to obtain the evidence based on the consent of any party who may have authority to consent. I believe, based upon the nature of the investigation and the information I have received, that if targets become aware of the investigation in advance of the execution of a search warrant, they may attempt to destroy any potential evidence, whether digital or non-digital, thereby hindering law enforcement agents from the furtherance of the criminal investigation.

REQUEST FOR AUTHORITY TO CONDUCT OFF-SITE SEARCH OF TARGET COMPUTERS

155. *Necessity of seizing or copying entire computers or storage media.* In most cases, a thorough search of premises for information that might be stored on digital devices or other electronic storage media often requires the seizure of the physical items and later off-site review consistent with the warrant. In lieu of removing all of these items from the premises, it is sometimes possible to make an image copy of the data on the digital devices or other electronic storage media, onsite. Generally speaking, imaging is the taking of a complete electronic picture of the device's data, including all hidden sectors and deleted

files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data recorded on the item, and to prevent the loss of the data either from accidental or intentional destruction. This is true because of the following:

a. *The time required for an examination.* As noted above, not all evidence takes the form of documents and files that can be easily viewed on site. Analyzing evidence of how a computer has been used, what it has been used for, and who has used it requires considerable time, and taking that much time on premises could be unreasonable. As explained above, because the warrant calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to thoroughly examine the respective digital device and/or electronic storage media to obtain evidence. Computer hard drives, digital devices and electronic storage media can store a large volume of information. Reviewing that information for things described in the warrant can take weeks or months, depending on the volume of data stored, and would be impractical and invasive to attempt on-site.

b. *Technical requirements.* Digital devices or other electronic storage media can be configured in several different ways, featuring a variety of different operating systems, application software, and configurations. Therefore, searching them sometimes requires tools or knowledge that might not be present on the search site. The vast array of computer hardware and software available makes it difficult to know before a search what tools or knowledge will be required to analyze the system and its data on the premises. However, taking the items off-site and reviewing them in a controlled environment will allow examination with the proper tools and knowledge.

c. *Variety of forms of electronic media.* Records sought under this warrant could be stored in a variety of electronic storage media formats and on a variety of digital devices that may require off-site reviewing with specialized forensic tools.

SEARCH TECHNIQUES

156. Based on the foregoing, and consistent with Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, the warrant I am applying for will permit seizing, imaging,

1 or otherwise copying digital devices or other electronic storage media that reasonably
2 appear capable of containing some or all of the data or items that fall within the scope of
3 Attachment B to this Affidavit, and will specifically authorize a later review of the media
4 or information consistent with the warrant.

5 157. Because several people share the Subject Premises as a residence, it is
6 possible that the Subject Premises will contain digital devices or other electronic storage
7 media that are predominantly used, and perhaps owned, by persons who are not suspected
8 of a crime. If agents conducting the search nonetheless determine that it is possible that the
9 things described in this warrant could be found on those computers, this application seeks
10 permission to search and if necessary to seize those computers as well. It may be impossible
11 to determine, on scene, which computers contain the things described in this warrant.

12 158. Consistent with the above, I hereby request the Court's permission to seize
13 and/or obtain a forensic image of digital devices or other electronic storage media that
14 reasonably appear capable of containing data or items that fall within the scope of
15 Attachment B to this Affidavit, and to conduct off-site searches of the digital devices or
16 other electronic storage media and/or forensic images, using the following procedures:

17 a. *Processing the Search Sites and Securing the Data.*

18 i. Upon securing the physical search site, the search team will
19 conduct an initial review of any digital devices or other electronic storage media located at
20 the subject premises or in subject vehicle described in Attachments A1-A7 that are capable
21 of containing data or items that fall within the scope of Attachment B to this Affidavit, to
22 determine if it is possible to secure the data contained on these devices onsite in a
23 reasonable amount of time and without jeopardizing the ability to accurately preserve the
24 data.

25 ii. In order to examine the electronically stored information
26 ("ESI") in a forensically sound manner, law enforcement personnel with appropriate
27 expertise will attempt to produce a complete forensic image, if possible and appropriate,

1 of any digital device or other electronic storage media that is capable of containing data or
2 items that fall within the scope of Attachment B to this Affidavit.²⁰

3 iii. A forensic image may be created of either a physical drive or a
4 logical drive. A physical drive is the actual physical hard drive that may be found in a
5 typical computer. When law enforcement creates a forensic image of a physical drive, the
6 image will contain every bit and byte on the physical drive. A logical drive, also known as
7 a partition, is a dedicated area on a physical drive that may have a drive letter assigned (for
8 example the c: and d: drives on a computer that actually contains only one physical hard
9 drive). Therefore, creating an image of a logical drive does not include every bit and byte
10 on the physical drive. Law enforcement will only create an image of physical or logical
11 drives physically present on or within the subject device. Creating an image of the devices
12 located at the search locations described in Attachments A1-A7 will not result in access to
13 any data physically located elsewhere. However, digital devices or other electronic storage
14 media at the search locations described in Attachments A1-A7 that have previously
15 connected to devices at other locations may contain data from those other locations.

16 iv. If based on their training and experience, and the resources
17 available to them at the search site, the search team determines it is not practical to make
18 an on-site image within a reasonable amount of time and without jeopardizing the ability
19 to accurately preserve the data, then the digital devices or other electronic storage media
20

21 _____
22 ²⁰ The purpose of using specially trained computer forensic examiners to conduct the imaging of
23 digital devices or other electronic storage media is to ensure the integrity of the evidence and to
24 follow proper, forensically sound, scientific procedures. When the investigative agent is a trained
25 computer forensic examiner, it is not always necessary to separate these duties. Computer forensic
26 examiners often work closely with investigative personnel to assist investigators in their search for
27 digital evidence. Computer forensic examiners are needed because they generally have
technological expertise that investigative agents do not possess. Computer forensic examiners,
however, often lack the factual and investigative expertise that an investigative agent may possess
on any given case. Therefore, it is often important that computer forensic examiners and
investigative personnel work closely together.

1 will be seized and transported to an appropriate law enforcement laboratory to be
2 forensically imaged and reviewed.

3 b. *Searching the Forensic Images.*

4 i. Searching the forensic images for the items described in
5 Attachment B may require a range of data analysis techniques. In some cases, it is possible
6 for agents and analysts to conduct carefully targeted searches that can locate evidence
7 without requiring a time-consuming manual search through unrelated materials that may
8 be commingled with criminal evidence. In other cases, however, such techniques may not
9 yield the evidence described in the warrant, and law enforcement may need to conduct
10 more extensive searches to locate evidence that falls within the scope of the warrant. The
11 search techniques that will be used will be only those methodologies, techniques and
12 protocols as may reasonably be expected to find, identify, segregate and/or duplicate the
13 items authorized to be seized pursuant to Attachment B to this affidavit. Those techniques,
14 however, may necessarily expose many or all parts of a hard drive to human inspection in
15 order to determine whether it contains evidence described by the warrant.

16 **REQUEST FOR SEALING**

17 159. It is respectfully requested that this Court issue an order sealing, until further
18 order of the Court, all papers submitted in support of this application, including the
19 application, affidavit and search warrant. I believe that sealing this document is necessary
20 because the items and information to be seized are relevant to an ongoing investigation and
21 disclosure of the search warrant, this affidavit, and/or this application and the attachments
22 thereto will jeopardize the progress of the investigation. Disclosure of these materials
23 would give the target of the investigation an opportunity to destroy evidence, change
24 patterns of behavior, notify confederates, or flee from prosecution.

25 **CONCLUSION**

26 160. Based on the information set forth herein, there is probable cause to search
27 the above described Target Locations and Target Vehicle, as further described in

1 Attachments A1-A7, for evidence, fruits and instrumentalities, as further described in
2 Attachment B, of crimes committed by the individuals listed in this affidavit and their
3 coconspirators, specifically distribution of, and possession with intent to distribute,
4 controlled substances, in violation of Title 21, United States Code, Section 841(a)(1);
5 conspiracy to distribute controlled substances, in violation of Title 21, United States Code,
6 Sections 841(a)(1) and 846; and/or laundering of, or conspiracy to launder, monetary
7 instruments in violation of Title 18, United States Code, Sections 1956(a) and (h).



CHRISTOPHER L. VANDENBOS
Task Force Officer
Drug Enforcement Administration

13 The above-named agent provided a sworn statement attesting to the truth of the
14 contents of the foregoing affidavit on the 14th day of July, 2023.



BRIAN A. TSUCHIDA
United States Magistrate Judge

ATTACHMENT A1

Location to be Searched

Target Location 1 (TL1): 6069 Neevel Road, Ferndale, WA 98248: Target Location 1 is located at 6069 Neevel Road, Ferndale, WA. Target Location 1 is a white travel trailer with thin dark stripes running laterally along the sides. There are two doors facing east. There is a green staircase leading to one of the doors.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.



ATTACHMENT A2

Location to be Searched

Target Location 2 (TL2): 1401 Woodstock Way, Unit #102H, Bellingham, WA

98226: Target Location 2 is an apartment labeled #102H, located at 1401 Woodstock Way, Bellingham, WA. Target Location 2 is located within a multi-unit residential complex that is tan in color with white trim. The door for unit 102-H is located on the south side of the residential complex, facing south. Unit 102-H is located on the first floor and the numbers reading "102-H" are affixed to the door. The door is white in color. There is an affixed Patio with a white railing on the north side of the complex for unit 102-H.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.



ATTACHMENT A3

Location to be Searched

Target Location 3 (TL3): 966 E. 69th Vista, Apt. 7, Lynden, WA 98264: Target

Location 3 is located at 966 E. 69th Vista, Apt. 7, Lynden, WA. Target Location 3 is a one-story single-family residence. The residence is tan in color with white trim, and composite roof. The residence appears to have a covered front door/entrance on the west side of the residence. The residence has a driveway, with access from the south, off E. 69th Vista. The number “7” is affixed to the south side of the residence in two separate locations, are both black in color, and visible from the driveway.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.



ATTACHMENT A4

Location to be Searched

Target Location 4 (TL4): 4238 Northwest Drive, Bellingham, WA 98226:

Target Location 4 is located at 4238 Northwest Drive, Bellingham, WA. Target Location 4 is a one-story single-family residence, with what appears to be an unattached outbuilding to the north. The residence is grey in color with white trim, and composite roof. The residence has a covered front door/entrance located on the west side of the residence. The residence has a driveway with access from the east side of Northwest Drive. The numbers “4238” are affixed to the front of the actual residence, on the west side, and visible from the driveway as you enter the property. The numbers “4238” are white in color.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.



ATTACHMENT A5

Location to be Searched

Target Location 5 (TL5): 2412 Rimland Drive, Apt. 410, Bellingham, WA

98226: Target Location 5 is located at 2412 Rimland Drive, Apt. 410, Bellingham, WA.

Target Location 5 is a fourth-floor apartment located within the Trailview Apartment building, located at 2412 Rimland Drive, Bellingham, WA. Target Location 5 is an apartment assigned number 410. There is a placard affixed to the left side of the front door that reads “410” in vertically descending numbers. The door front door has a grey metal door handle on the left side of the door.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.



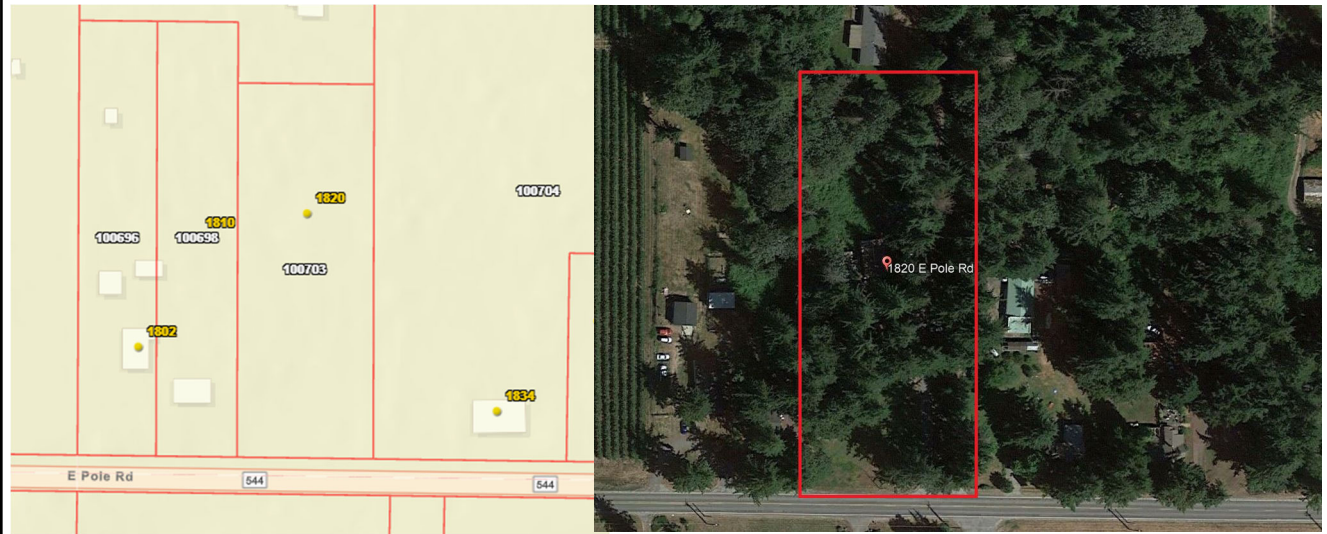
ATTACHMENT A6

Location to be Searched

Target Location 6 (TL6): 1820 East Pole Road, Everson, WA 98247: Target Location 6 is located at 1820 East Pole Road, Everson, WA. Target Location 6 is a property located at 1820 East Pole Road, Everson, WA. According to the Whatcom County Assessor website, the parcel number is 3903021580280000. There is a single-story residence on the property with brown siding. On the south side of the residence, there are white numbers showing “1820” affixed to the siding. There is a shop on the property with green metal siding and a green door. There are multiple trailers and vehicles within the boundary of the property.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports and associated parking stalls, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location.





ATTACHMENT A7

Vehicle to be Searched

Target Vehicle 3 (TV3): A blue 2006 Chevrolet Cobalt: Target Vehicle 3 is a 2006 Chevrolet Cobalt, with Vehicle Identification Number (VIN) 1G1AK15F967805540.

The areas to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. This includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.



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²¹ The photograph depicts Target Vehicle 3 bearing a previous license plate. According to Washington DOL records, as of July 13, 2023, the license plate associated with this vehicle was CHH1986.

ATTACHMENT B

Items to be Seized

This warrant authorizes the government to search for the following evidence, fruits, and/or instrumentalities of Distribution and/or Possession of Controlled Substances with Intent to Distribute in violation of Title 21, United States Code, Section 841(a)(1); conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and/or laundering of, or conspiracy to launder, monetary instruments in violation of Title 18, United States Code, Sections 1956(a) and (h):

1. Controlled Substances and controlled substance analogues.

2. Drug Paraphernalia and Instruments of Drug Trafficking: Items used, or to be used, to store, process, package, use, and/or distribute controlled substances; plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances.

3. Drug Transaction Records: Documents such as ledgers, receipts, and notes relating to the acquisition, transportation, and distribution of controlled substances, however stored, including in digital devices.

4. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, and maps or directions.

5. Cash and Financial Records: Currency and financial records, such as bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, and vehicle documents; records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, and cashier's checks.

6. Photographs/Video: Photographs, video tapes, digital cameras, surveillance cameras, and associated hardware/storage devices depicting property occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled

1 substances, controlled substances or other contraband, weapons, and assets derived from
2 the distribution of controlled substances.

3 7. Weapons, including firearms, magazines, ammunition, and body armor.

4 8. Codes: Evidence of codes used in the distribution of controlled substances,
5 such as passwords, code books, cypher or decryption keys.

6 9. Property Records: Deeds, contracts, escrow documents, mortgage
7 documents, rental documents, and other evidence relating to the purchase, ownership,
8 rental, income, expenses, or control of the Subject Premises, and similar records of other
9 property owned or rented.

10 10. Indicia of occupancy, residency, and/or ownership of assets such as utility
11 and telephone bills, canceled envelopes, rental records or payment receipts, leases, and
12 mortgage statements.

13 11. Evidence of storage unit rental or access such as rental and payment records,
14 keys and codes, pamphlets, contracts, contact information, directions, and passwords.

15 12. Evidence of Personal Property Ownership: Registration information,
16 ownership documents, or other evidence of ownership of personal property such as
17 vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and jewelry; evidence
18 of international or domestic travel, hotel stays, and other evidence of unexplained wealth.

19 13. Individual and business financial books, records, receipts, notes, ledgers,
20 diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

21 a. Employment records: paychecks or stubs, lists and accounts of
22 employee payrolls, records of employment tax withholdings and contributions, dividends,
23 stock certificates, and compensation to officers.

24 b. Savings accounts: statements, ledger cards, deposit tickets, register
25 records, wire transfer records, correspondence, and withdrawal slips.

26 c. Checking accounts: statements, canceled checks, deposit tickets,
27 credit/debit documents, wire transfer documents, correspondence, and register records.

1 d. Loan Accounts: financial statements and loan applications for all
2 loans applied for, notes, loan repayment records, and mortgage loan records.

3 e. Collection account statements and other-related records.

4 f. Certificates of deposit: applications, purchase documents, and
5 statements of accounts.

6 g. Credit card accounts: credit cards, monthly statements, and receipts of
7 use.

8 h. Receipts and records related to gambling wins and losses, or any other
9 contest winnings.

10 i. Insurance: policies, statements, bills, and claim-related documents.

11 j. Financial records: profit and loss statements, financial statements,
12 receipts, balance sheets, accounting work papers, any receipts showing purchases made,
13 both business and personal, receipts showing charitable contributions, and income and
14 expense ledgers.

15 14. All bearer bonds, letters of credit, money drafts, money orders, cashier's
16 checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money
17 wrappers, stored value cards, and other forms of financial remuneration evidencing the
18 obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

19 15. All Western Union and/or Money Gram documents and other financial
20 documents evidencing domestic or international wire transfers, money orders, official
21 checks, cashier's checks, or other negotiable interests that can be purchased with cash,
22 including applications, payment records, money orders, and frequent customer cards.

23 16. Negotiable instruments, jewelry, precious metals, and financial instruments.

24 17. Documents reflecting the source, receipt, transfer, control, ownership, and
25 disposition of United States and/or foreign currency.

26 18. Correspondence, papers, records, and any other items showing employment
27 or lack of employment.

1 19. Phone books, address books, any papers or documents reflecting names,
2 addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile,
3 and/or telex numbers, telephone records and bills relating to co-conspirators, sources of
4 supply, customers, financial institutions, and other individuals or businesses with whom a
5 financial relationship exists; telephone answering devices that record telephone
6 conversations and the tapes therein for messages left for or by co-conspirators for the
7 delivery or purchase of controlled substances or laundering of drug proceeds.

8 20. Safes and locked storage containers, and the contents thereof which are
9 otherwise described in this document.

10 21. Tools that may be used to open hidden compartments in vehicles, such as
11 paint, bonding agents, magnets, or other items that may be used to open/close said
12 compartments.

13 22. Digital computing devices, e.g., desktop and laptop computers and table
14 devices; digital storage devices, e.g., external hard drives and USB thumb drives, and;
15 optical and magnetic storage media, e.g., Blue Ray discs, DVDs and CDs.

16 23. Pill press machine, encapsulating machine, and other tools or equipment used
17 to manufacture pills.

18 24. Cell Phones and other digital communication devices for evidence, fruits,
19 and/or instrumentalities of the above-referenced crimes, specifically:

20 a. Assigned number and identifying telephone serial number (ESN,
21 MIN, IMSI, or IMEI);

22 b. Stored list of recent received, sent, or missed calls;

23 c. Stored contact information;

24 d. Stored photographs and videos of narcotics, currency, financial
25 records (such as deposit slips and other bank records), RVs and other vehicles, firearms or
26 other weapons, evidence of the aforementioned crimes of investigation, and/or that may
27 show the user of the phone and/or coconspirators, including any embedded GPS data

1 associated with these photographs; and

2 e. Stored text messages that are evidence of the above-listed federal
3 crimes or that may identify the user of the seized phones and/or coconspirators, including
4 messages sent via messaging apps, including Wickr, Signal, WhatsApp, and Telegram, or
5 other similar messaging services where the data is stored on the telephone.

6 This warrant authorizes a review of electronic storage media and electronically
7 stored information seized or copied pursuant to this warrant in order to locate evidence,
8 fruits, and instrumentalities described in this warrant. The review of this electronic data
9 may be conducted by any government personnel assisting in the investigation, who may
10 include, in addition to law enforcement officers and agents: attorneys for the government,
11 attorney support staff, and technical experts. Pursuant to this warrant, DEA may deliver a
12 complete copy of the seized or copied electronic data to the custody and control of attorneys
13 for the government and their support staff for their independent review.